98 00647

San Francisco Community College District

CITY COLLEGE OF SAN FRANCISCO
CHINATOWN / NORTH BEACH CAMPUS

Comments and Responses

State Clearinghouse No. 98031039

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Draft EIR Publication Date: April 23, 1998
Draft EIR Public Hearing Date: May 19, 1998
Draft EIR Public Comment Period: April 23 to May 23, 1998
Proposed Final EIR Certification Date: July 21, 1998

Prepared By:

EIP
ASSOCIATES

601 Montgomery Street, Suite 500
San Francisco, CA 94111

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I. INTRODUCTION

A Draft Environmental Impact Report (DEIR) was prepared by the San Francisco Community College District (District) to disclose potential environmental effects of the proposed Chinatown/North Beach Campus project. The DEIR included a description of the proposed changes to the project site, an assessment of potential effects from development, a description of possible mitigation measures to minimize significant effects that were identified in the DEIR, and a consideration of alternatives that could address potential impacts. In accordance with the California Environmental Quality Act (CEQA), the DEIR was distributed for public review and comment.

The public review period for the DEIR began April 23, 1998, and ended May 23, 1998. During this time, the document was reviewed by various state and local agencies, as well as by interested organizations and individuals. In addition, the District Board of Trustees held a public hearing on May 19, 1998, to provide the public with an opportunity to present comments about the DEIR. Written comments were received from 3 public agencies and about 14 individuals and/or organizations. Oral comments were offered by 25 individuals.

This Comments and Responses document addresses comments on the DEIR raised during the public review period, and contains revisions intended to correct and clarify the DEIR. The information provided in this document substantiates and confirms the analyses in the DEIR. No new substantial environmental impact and no increase in the severity of an earlier identified impact have been identified as a result of the responses in this document. Together, the DEIR and the Comments and Responses constitute the Final Environmental Impact Report (Final EIR). The District must certify the Final EIR before the project can be approved. Certification requires that the District Board of Trustees make findings that the Final EIR complies with CEQA and state guidelines.

The District Board of Trustees intends to review the Final EIR and is expected to consider its certification at a special meeting, open to the public, to be held Tuesday, July 21, 1998, at 6:00 p.m. at 33 Gough Street, San Francisco, CA 94103. The Board will also decide at that meeting whether to approve the project. For directions or other inquiries related to this meeting, please call the District offices at (415) 241-2372.

HOW TO USE THIS REPORT

This document addresses substantive comments received during the public review period. Copies of the letters received by the District, and of the public hearing transcript, are presented in Chapter III of this document.

This document consists of five chapters: 1) Introduction; 2) List of Commenters; 3) Comments and Responses; 4) Summary of Text and Figure Changes; and 5) Additional Letters. Chapter I, Introduction, reviews the purpose and contents of this Comments anc Responses document. Chapter II lists the public agencies, organizations, and individuals who wrote letters or spoke at the public meeting on the DEIR. Chapter III includes the comment letters and the oral testimony, and presents responses to those comments. For the most part, the responses provide explanation or additional discussion of text in the DEIR. In some instances, the response supersedes or supplements the text of the DEIR for accuracy or clarification. New text that has been added to the DEIR is indicated with underlining. Text that has been deleted is indicated with ~~overstriking~~. Chapter IV summarizes revisions that have been made to the text and graphics of the DEIR. Chapter V reproduces letters on the project received during the public comment period.

II. LIST OF COMMENTERS

A. WRITTEN COMMENTS

Seventeen comment letters were received on the DEIR. Other letters received during the public review period that do not address the adequacy of the EIR are included in Chapter V of this document. Public agency letters commenting on the DEIR are denoted with an asterisk.

1. David Bahlman, Executive Director, The Foundation for San Francisco's Architectural Heritage
2. David E. Lipson
3. Harold L. Moose, Jr., Chelsea Development Company, LLC
4. Phil Horowitz, Attorney at Law, Lawless, Horowitz & Lawless
5. Gen Fujioka, Attorney at Law, Asian Law Caucus
6. Theodore H. Wang, Interim Executive Director, Chinese for Affirmative Action
7. Gordon Chin, Executive Director, Chinatown Community Development Center
8. Randy Shaw, Executive Director, Tenderloin Housing Clinic
9. Aaron Peskin, Friends of the Colombo Building, and Arthur Chang, Committee to Stop Downtown Sprawl
10. Daniel F. Reidy
11. Gerry Crowley, President, The Telegraph Hill Dwellers
12. Deborah M. Castles, Attorney at Law, and Michael H. Zischke, Attorney at Law, Landels, Ripley & Diamond

*13. Gerald G. Green, Director of Planning, City and County of San Francisco Planning Department

14. Philip S. Ward, Attorney at Law, Hassard Bonnington, LLP

15. Gertrude B. Platt, G. Bland Platt Associates

*16. Deborah Learner, Park Planner, City and County of San Francisco Recreation and Park Department

*17. Antero A. Rivasplata, Chief, State Clearinghouse, Governor's Office of Planning and Research

B. ORAL COMMENTS

In addition to the written comment letters, 25 individuals made comments at the public hearing on May 19, 1998. Speakers representing public agencies are noted with an asterisk.

- Bob Planthold
- Mimi Chang
- Po Yee Au
- Luna Yasui, Chinese for Affirmative Action
- Isabel Huie, Chinese for Affirmative Action
- Norman Yee, Executive Director, Yee Children Services
- Larry Mock, Mock-Wallace Architects
- Wai Ching Kwan, Chinatown Community Development Center
- Richard Ow
- Susan Wang, Student Council of Chinatown North Beach
- Faye Lee, San Francisco Chinese-American Citizens Alliance
- Linda Wang, Chair of Advisory Committee and President of Housing Corporation, International Hotel Citizens Advisory Committee and the Kearny Street Housing Corporation

- Teresa Wu, Executive Director, Chinese Newcomers Service Center
- * Marsha Rosen, Director, Mayor's Office of Housing
- Doris Ward, Assessor of City and County of San Francisco
- David Ling Wang
- Belinda Kan Lee
- Sammi Huang, Associated Students Council at Chinatown/North Beach Campus of City College
- Anna Yin
- Kelvin Kwan, Co-President, Associated Students Council at Chinatown/North Beach Campus of City College
- Victor Seeto, Chinese American Democratic Club
- Ling-Chi Wang, Chair, Chinese for Affirmative Action
- Gen Fujioka, Asian Law Caucus
- Brendan Leung, Chinatown Campus Advisory Committee
- Bob Siegel, Chair, Chinatown/North Beach Campus Building Committee

III. COMMENTS AND RESPONSES

This section presents the written and oral comments received on the Chinatown/North Beach Campus DEIR. Specific comments in each letter have been identified and numbered. Responses follow each comment letter, numbered to correspond with the comment number. Response 12-10, for example, refers to the response for the tenth comment in Comment Letter 12.

THE FOUNDATION FOR
SAN FRANCISCO'S
ARCHITECTURAL
HERITAGE

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May 23, 1998

Peter A. Goldstein
Chief Operating Officer, City College of San Francisco
33 Gough Street
San Francisco, CA 94103

Re: Draft Environmental Impact Report/ Chinatown/North Beach Campus
State Clearinghouse # 98031039

Dear Mr. Goldstein:

The Foundation for San Francisco's Architectural Heritage would like to offer the following comments on the Draft Environmental Impact Report.

As you may know, Heritage signed a Settlement Agreement on July 12, 1988 with Four Seas Investment Corporation with regard to our opposition to the demolition of the Columbo Building. The document is not referenced in the DEIR, and therefore the terms and conditions regarding financing requirements, permit requirements, and notice to Heritage of work under the demolition permit are not recognized. As stated in the agreement, these terms "shall be binding upon and inure to the benefit of the parties and their respective heirs, successors and assigns". I attach a copy of this agreement, which must be incorporated into the DEIR. 1

The extensive design guidelines for a new structure on the Columbo Building site which were developed by Heritage in consultation with Pan Magna's attorney and architect are not included in the DEIR. 2

The standard mitigation measures spelled out on page 68 are no longer acceptable, given the February 1997 decision spelled out in The League for the Protection of Oakland's Architectural and Historic Resources v. The City of Oakland et.al 3

On page 66, under the discussion of architectural ratings for the Columbo Building, the DEIR cites a Heritage rating of B* for the Columbo Building. There is no such Heritage rating. Is this a typo? If the author is referring to a B+ rating, then he is inaccurate in his assumption that the Columbo Building would not be considered by Heritage to be National Register eligible. 4

The Page and Turnbull report which documents the environmental setting for the project should be incorporated into the DEIR as important documentation regarding the Jackson Square and Chinatown Historic Districts. 5

6 It has come to our attention that Mr. Harold Moose has made an offer on the Columbo Building site which would implement the "environmentally superior" Alternative C in the DEIR. We hope that this offer will be evaluated in the current DEIR.

Sincerely,

David Bahlman

David Bahlman
Executive Director

DB/at

cc: Michael Rice

SETTLEMENT AGREEMENT

This Settlement Agreement is made and entered into as of this 12th day of July, 1988, by and between Four Seas Investment Corporation ("Four Seas"), a California corporation and the Foundation for San Francisco's Architectural Heritage, a California nonprofit corporation ("Heritage").

RECITALS

This Agreement is entered into on the basis of the following facts, understandings and the intentions of the parties:

A. On July 9, 1987, the City Planning Commission granted a conditional use permit for a project called Pan Magna Plaza (the "Project"), a planned unit development including retail and residential development at the southeast corner of Jackson and Kearny Streets (the "A Site") and office and retail development at the northwest corner of Columbus Avenue and Washington Street (the "B Site").

B. On May 19, 1988, the Department of Public Works issued a site permit for construction of the A Site building (Permit No. 589130), a demolition permit for the demolition of the Colombo Building on B Site (Permit No. 589132, hereinafter referred to as "the Demolition Permit"), and a site permit for the construction of the B Site building (Permit No. 589129).

C. There were no appeals from the issuance of either Site Permit No. 589130 or Site Permit No. 589129.

D. Heritage has filed an appeal on the issuance of the Demolition Permit with the Board of Permit Appeals.

E. Heritage and Four Seas have engaged in a series of discussions, facilitated by the Mayor's Office of Housing, to resolve and settle the issues between them involved in the appeal.

F. Heritage and Four Seas desire to settle all disputes between them in connection with the Project, to provide for certain limits on Four Seas with respect to the exercise of the Demolition Permit, and to provide for a waiver, release and abandonment of all claims, objections and challenges which Heritage may have with respect to the Project.

NOW, THEREFORE, in consideration of the mutual covenants and agreements contained herein, the parties agree as follows:

I. OBLIGATIONS OF FOUR SEAS.

A. Four Seas agrees not to demolish the Colombo Building pursuant to the existing Demolition Permit or any extension of such Permit until such time as both of the following conditions have been met:

(1) Four Seas shall have obtained financing or a binding commitment for financing which shall be sufficient to construct the new building on B Site and shall have submitted evidence thereof to Heritage. Such financing may be either equity debt or equity financing, but must, at a minimum, consist

of either possession of a sufficient amount of financial resources to complete such construction or a binding agreement with a bona fide source which adequately provides for obtaining such financial resources.

(2) Four Seas shall have obtained from the City a building permit addendum to Site Permit No. 589132 sufficient to permit Four Seas to commence construction of the building on B Site.

B. Notwithstanding Paragraph A above, Four Seas will be permitted to demolish the Colombo Building pursuant to the Demolition Permit without complying with the terms set forth in Paragraph A if such permit would otherwise expire within a 30-day period, and prior to the commencement of such 30-day period Four Seas, despite good faith efforts and timely formal application to the City, has been unable to obtain any further extension or extensions of time under the Demolition Permit.

C. Four Seas shall give Heritage five (5) days' prior written notice of commencement of work under the Demolition Permit.

II. OBLIGATIONS OF HERITAGE.

A. Heritage shall withdraw with prejudice its appeal (No. 88-144) on file with the Board of Permit Appeals.

B. So long as the Project is being diligently pursued, Heritage agrees not to seek registration or designation of the Colombo Building as an historic or architecturally significant structure under any federal, state or local law.

C. Heritage agrees not to appeal any building permit, site permit, or demolition permit or addendum or extension thereof related to the Project which are consistent with the Conditional Use Permit.

III. GENERAL PROVISIONS.

A. Authority of Parties; Binding Effect. Each party warrants and represents to each other party that (i) it has the full organizational authority and the right to enter into and perform its obligations under this Agreement, (ii) it has taken all organizational or corporate action as appropriate or necessary to authorize its execution and performance of this Agreement, and (iii) upon execution and delivery of this Agreement by all parties, the Agreement shall be a valid and binding agreement and obligation of each such party, enforceable in accordance with its terms. This Agreement shall be binding upon and inure to the benefit of the parties and their respective heirs, successors and assigns.

B. Entire Agreement. This Agreement constitutes the entire Agreement among the parties with respect to the subject matter and supersedes any prior negotiations, understanding or agreements.

C. Amendment. This Agreement may be amended only in writing, signed by the then authorized representatives of each of the parties.

D. Governing Law. This Agreement shall be construed and interpreted in accordance with and governed by all of the provisions of the laws of the State of California.

E. Notices. Any notices required or permitted to be given by either party to the other party shall be directed to each party at the address set forth below next to the name of each.

IN WITNESS WHEREOF, the parties have executed this Agreement as of the date and year first above written.

FOUR SEAS INVESTMENT CORPORATION	555 Montgomery Street Suite 1225 San Francisco, CA 94111

By

Attorneys for Four Seas Investment Corporation

FOUNDATION FOR SAN FRANCISCO'S ARCHITECTURAL HERITAGE	2007 Franklin Street San Francisco, CA

By

Title Executive Director

Letter 1: David Bahlman, Executive Director, The Foundation for San Francisco's Architectural Heritage

Response 1-1

The District is aware of the 1988 Settlement Agreement between Heritage and Four Seas Investment Corporation. This comment does not specify any environmental issues to which the District may respond. Please see Response 15-4.

Response 1-2

The previous design guidelines for Site B were included as Conditions of Approval for the previous Kearny Street/Columbus Avenue Project. The guidelines described a specific detailed design for the office building project and do not apply to the Chinatown/North Beach Campus Project. As noted on DEIR p. 18, the final design of the proposed campus would relate to the historical fabric of adjacent historic resources. Figure 18-1, added as a new figure in Response 9-38, shows a level of design for the proposed campus, which is subject to further refinement. Mitigation measures for demolition of the Colombo Building are presented on DEIR pp. 111-112.

Response 1-3

The referenced case is not applicable in the present circumstances. The case, League for Protection of Oakland's Architectural and Historic Resources v. City of Oakland, 52 Cal.App.4th 896 (1997), stands for the proposition that documentation does not adequately mitigate the demolition of a building to render the effect of demolition insignificant. The DEIR acknowledges on p. 68 that the impact of demolition of the Colombo Building would remain significant and unavoidable, and proposes documentation as a measure to reduce somewhat the adverse effects. Recognizing that the impact of demolition would remain significant even after mitigation, the DEIR evaluates two alternatives that would preserve the Colombo Building (Alternative A1 and Alternative C) and also discusses the availability of alternative sites which would avoid demolition. See DEIR pp. 114-15, 119-120, 126.

Response 1-4

DEIR p. 66, Section III.C, Historical and Architectural Resources, cites the 1985 Foundation for San Francisco's Architectural Heritage (Heritage) extended survey of downtown. That survey evaluated the Colombo Building with a "B*" rating. Based on further consultation with Heritage staff, "B*" is the correct rating in that survey for the Colombo Building. The B* rating was developed by Heritage for its North Beach area survey to rate buildings which did not easily fit within their standard rating system./1/ The B* for the Colombo Building denotes alterations to the structure which affect its integrity; B* means if these alterations were reversed or removed, the building would be rated "A" by Heritage. While the 1985 Heritage survey did not specifically identify the Colombo Building as potentially eligible for the National Register of Historic Places, "A" ratings are generally considered by Heritage to represent buildings eligible for the National Register.

Response 1-5

Footnote 2 at the end of the first paragraph on DEIR p. 62 in Section III.C, Historical and Architectural Resources, cites relevant sections from the 1987 FEIR and the 1996 SEIR that are incorporated by reference into the DEIR, including the August 1996 Page & Turnbull study, which was included in the 1996 SEIR as an appendix. The 1996 SEIR and the Page & Turnbull study were sources used in the DEIR to characterize the Jackson Square Historic District and the potential Chinatown Historic District. Please also see Response 9-11 for additional discussion regarding the Page & Turnbull study prepared in December 1996.

Response 1-6

Please see Response 3-5 regarding the preservation scheme offered by Chelsea Development.

---

1. Don Andreini, The Foundation for San Francisco's Architectural Heritage, telephone conversation, June 17, 1998.

2

David E. Lipson
275 Battery Street, Suite 1480
San Francisco, CA 94111

May 11, 1998

Peter A. Goldstein
Chief Operating Officer
San Francisco Community College District
33 Gough Street
San Francisco, CA 94103

FAX: (415) 241-2344

Dear Mr. Goldstein:

I was recently made aware of the plans to build the Chinatown/North Beach Campus of the City College of San Francisco at the corner of Columbus and Washington and to demolish the Fong and Colombo buildings. As a homeowner at the Washington Montgomery Tower, 611 Washington Street, I feel it is my duty to register my outrage at this proposal.

I am certain I echo the sentiments of every property owner in the area when I
say that building the proposed campus would be very detrimental to the
character of the neighborhood, the value of my property and the general
quality of life experienced there. I took all of these factors into consideration 1
when I purchased my two condominiums at the Washington Montgomery
Tower, and feel that each would be greatly impacted by your plan to locate a
community college across the street. Of equal importance is the loss of the
Fong and Colombo buildings, as well as the certain displacement of the 2
residents of these buildings.

Although I believe in the need to further education everywhere, I cannot
believe that the proposed location is the best place to build a college campus.
The area is focused toward meeting the needs of local businesses and
residents, and can have few benefits for students of any kind. The comings 3
and goings of hundreds of students on a daily basis would surely cause crime,
vagrancy and vandalism to increase, just as my property value would
inevitably decrease. The proposed use of this site is very definitely misplaced.

Although I will be traveling and unable to attend the May 19th public hearing on this subject, I wanted to take the opportunity to voice my extreme unhappiness with the project. I will do everything in my power to oppose it.

If you have any questions or if I can provide any additional comments, please do not hesitate to call me at (415) 434-4334.

Sincerely,

Letter 2: David E. Lipson

Response 2-1

As discussed in CEQA Guidelines Section 15131, socio-economic information can be used to trace a chain of cause and effect on physical environmental conditions; changes in socio-economic conditions in themselves are not considered significant effects, and are not required analyses in an EIR. The comment will be taken into consideration by the District Board of Trustees during the decision-making process.

Response 2-2

The proposed demolition of the Colombo Building and Fong Building is addressed in Section III.C, Historical and Architectural Resources, of the DEIR, which concluded that demolition of the Colombo Building would be a significant unavoidable impact, and demolition of the Fong Building would be a less-than-significant impact. The displacement of residents from the Fong Building is addressed in Section III.A, Land Use and Zoning, of the DEIR, which concluded that loss of the housing units would be a significant and unavoidable impact.

Response 2-3

Alternative sites previously considered for the Chinatown/North Beach Campus, and the reasons why those sites were rejected from further consideration, are described in Chapter V, Alternatives, of the DEIR, pp. 120-123.

As noted on p. A.43 in Appendix A, Notice of Preparation (NOP)/Initial Study, although a small increase in demand for fire and police services may result from expected growth in student enrollment, the project is not expected to create an increase in fire or police protection that would require the construction of new fire and police facilities. The project site area is essentially built-out and currently has fire and police protection services. The benefits to students resulting from the project as envisioned by the District are explained on p. 16 of the DEIR. The objectives of the project, as identified in the Needs Assessment Study, including site accessibility and site area requirements, are explained on p. 17 of the DEIR.

3

CHELSEA DEVELOPMENT COMPANY LLC

May 22, 1998

Via Silver Bullet Courier and Fax (415) 241-2344

The Board of Trustees
City College of San Francisco
50 Phelan Avenue, Box E200
San Francisco, CA 94112

Attention: Peter A. Goldstein

I am responding to your Request for EIR Comments in the public letter of April 23, 1998. Please consider the enclosures mentioned below as an integral part of these comments.

As the original developer of the Holiday Inn Building across Washington Street from Block 195, I have been obviously concerned with the general development of the neighborhood and especially with the views which could be jeopardized with buildings in excess of the 65 foot zoning on the north side of Washington Street. 1

We were awarded the development rights for our property in 1967, as a result of a S. F. Redevelopment Agency competition with the provision that we provide 20,000 feet in our building to a Chinese Culture Center and build a bridge over Kearny Street. As a result, we have played a significant role in the economic and cultural life of Chinatown, and accordingly would welcome a Chinatown campus for City College. We have waited these many years for a responsible development by an institution of your stature to correct the abysmal conditions directly across Washington Street.

However, I am concerned as a developer of several historic buildings in other areas, that you have not given adequate consideration to the historic value of the Columbo Building. We feel that "environmentally superior Alternative C" has a high degree of viability, and at the same time we understand that restoration of a historic structure may be outside the scope of your very successful mission in educating Bay Area adults. 2

750 Kearny Street, 4th Floor, San Francisco, California, 94108
TEL: (415) 989-9677 FAX: (415) 989-9679

2 I enclose a copy of my (Chelsea Development) Purchase Offer of April 1, 1998 and copy of my May 8, 1998 letter and drawings, with the dual objectives of taking responsibility for the exacting U.S. Dept. of the Interior standards for preservation of the Columbo Building while allowing the College to meets its program needs on the balance of the site. Obviously my offer is backed by sufficient capital to allow either of us to alternately divide the property by appraisal or by some form of lease or co-development agreement.

3 We are aware that the square footage requirement of the College will require a resettlement of the occupants of Lot 12, but we noted in the hearing of May 19th that representatives of the College declared their commitment to solving this very important element of the project.

I am available to meet with any representatives of City College or its Trustees to answer questions or for the elaboration of these comments.

Sincerely,

Harold L. Moose, Jr.
General Partner
Chelsea Development Co. LLC

HLM:mg
Enclosures

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April 1, 1998

VIA MESSENGER

Mr. Wilhelm Fleurbaaij
Pan Magna Group
350 Sansome Street, Suite 1010
San Francisco, CA 94104

Mr. Peter Goldstein
Chief Executive Officer
City College of San Francisco
50 Phelan Avenue
San Francisco, CA 94112

RE: Preservation of Colombo Building

Dear Messrs. Fleurbaaij and Goldstein:

Our firm represents Chelsea Development Co., which would like to acquire and preserve the Colombo Building and acquire the adjacent lot. We understand that this property is under contract pursuant to an Agreement of Purchase and Sale between Pan Magna Group and City College of San Francisco.

As you know, several neighborhood groups have expressed vigorous opposition to City College's proposed demolition of the Colombo Building and the proposed construction of a North Beach campus, to the point where the "Friends of the Colombo Building" have commenced litigation over the proposed demolition and development. In addition, Mayor Willie Brown, when considering this very issue at a town meeting of Telegraph Hill and North Beach residents and merchants, commented publicly that the City's first goal should be to avoid tearing such buildings down. 4

Chelsea wants to preserve the character of the neighborhood and the Colombo Building. Chelsea believes it can create a unique opportunity to preserve and upgrade the Colombo Building. To that end, please find enclosed a proposed Assignment of Agreement of Purchase and Sale, pursuant to which City College of San Francisco would assign to Chelsea its rights under its Purchase Agreement with Pan Magna. We believe that the proposed assignment offers significant benefits: 4

- It would expedite Pan Magna's sale of the property;

- It would allow the City College to avoid litigation and substantial negative publicity;

- It would pay City College up to $100,000 as reimbursement for all costs and expenses it has incurred with respect to the property; and

- It would preserve the Colombo Building.

Please consider the proposed Assignment and reply to me or Harold Moose of Chelsea directly at 989-9677 by April 7, 1998. Thank you.

Very truly yours,

Tom Larsen

Thomas A. Larsen

cc: The Honorable Willie Brown (w/out encl.)
Ms. Cherilyn Widell of the State Historic Preservation Office (w/out encl.)
Mr. David Bahlman of the Foundation for San Francisco
Architectural Heritage (w/out encl.)
Susan Brandt-Hawley, Esq. (w/out encl.)
✓Mr. Harold Moose

May 8. 1998

Mr. Peter A. Goldstein
Chief Operating Officer
San Francisco Community College District
33 Gough Street
San Francisco, CA 94103

It was a pleasure meeting you last week. As I looked over your EIR it occurred to me that building on lots 5, 6 and 12 might result in a more efficient and economical structure than trying to fit your needs into the triangular portion of the site occupied by the Colombo Building.

The trick with hotel design is to have a site that is long and narrow so that every room has a view. Because I will be preserving the Colombo Building you will have view lines on the eastern edge of lot 5. This means that no point in your building will be more than 38 feet from a window. Just like in my hotel you will have a site configuration that is optimized to your proposed use. As a result your ratio of assignable square footage to gross square footage will be much better, and your site acquisition costs will be more modest.

The following drawings, along with my offer to purchase the Colombo Building, may enable you to successfully implement alternative C (the environmentally superior alternative) described in your Draft Environmental Impact Report. This would satisfy the plaintiffs in the pending litigation and render unnecessary the significant environmental impact of demolishing the Colombo Building. Depending on whether or not you acquire lot #6 it should meet between 90% and 100% of your projected assignable square footage needs.

Suggested Design Changes to Make Demolition of the Colombo Building Unnecessary

5

The portion of Ils Lane that bisects the property has been incorporated into the site, and an emergency exit corridor has been created through the far west portion of the building connecting Ils Lane to Gibb Street. Ils Lane is a non-dedicated right of way that exists solely to provide an emergency exit for the buildings on lots 6, 7 and 8. It is something of an anachronism, and the Mayor is willing to endorse abandonment by the city if it's life safety function is still maintained. Abandonment of Ils Lane will allow you to build one fully integrated building, rather than two separate buildings connected by an overhead walkway. This is inherently more efficient and economic than the two structures you propose.

Our design philosophy has been to configure an interior layout that is efficient in the way that common areas and view lines are utilized. Service functions and the garage entrance have been placed on Gibb Street so that the auditorium can exist within the narrower and longer south wing of the building. The bookstore has been placed directly off of the main lobby in recognition of the fact that it is primarily designed to serve students rather than the general public. The loading dock will have direct access to the bookstore, and access to the rest of the building through the garage. The freight elevator should be situated in order to minimize the loss of parking in the garage below.

The floor of the auditorium has been placed below grade (sloping down from the lobby level) so that you can enjoy a full second floor. Freight access to the auditorium could be through the garage, or from a yellow zone at the curb on Washington Street. We have assumed that freight needs for the auditorium will be to support lectures and conferences, rather than freight intensive theatrical or musical productions.

Placing the auditorium partially below grade will decrease parking capacity, but it will increase assignable square footage elsewhere in the building. Moreover, the resulting loss of parking is not environmentally significant because the structure would still have well over 20,000 square feet of garage space (assuming one and one half floors of below grade parking. This should easily exceed the City of San Francisco accessory parking requirement (especially since Chinatown is exempt from strict compliance with the accessory parking regulations, and you could always valet park cars if necessary).

The utility room has been eliminated because it does not seem to have a clear programmatic function. If the utility room is in fact a high priority item we would suggest configuring it in such a way that it's high ceiling does not eliminate floor area on the third floor. Perhaps the Auditorium vestibule could be three or four feet below the main lobby level and the utility room floor could be six to eight feet above the main lobby level. The objective would be to make as much area as possible on floors 2 through 7 available for direct program needs.

The main outdoor courtyard and the curved glass curtain wall lobbies on each floor of the main building have been eliminated. We have substantially increased the size of the main lobby so that it can service some, if not all, of the uses originally anticipated for the courtyard and lobby. We would also suggest constructing a rooftop study center to replace the small lobbies on each floor. We believe that such a study center could be constructed so that it would not cast a significant new shadow on areas of Portsmouth Square accessible to the public. It would also have an inspiring view of Telegraph Hill and the Bay if it were situated along the north side of the building. 5

Assignable Square Footage Calculations

The suggestions in this letter have been directed toward increasing the ratio of assignable square footage to gross square footage so that your program needs can be met in the smaller footprint represented by the consolidation of lots 5, 12 and Ils Lane. The footprint of this area is 16,760 square feet. At seven stories with full site coverage gross square footage would be 117,320 gsf. The proposed structure for lots 4, 5 and 12 has assignable square footage (asf) equal to 64% of gross square footage (gsf). Applying this same formula to our design would result in 75,000 asf.

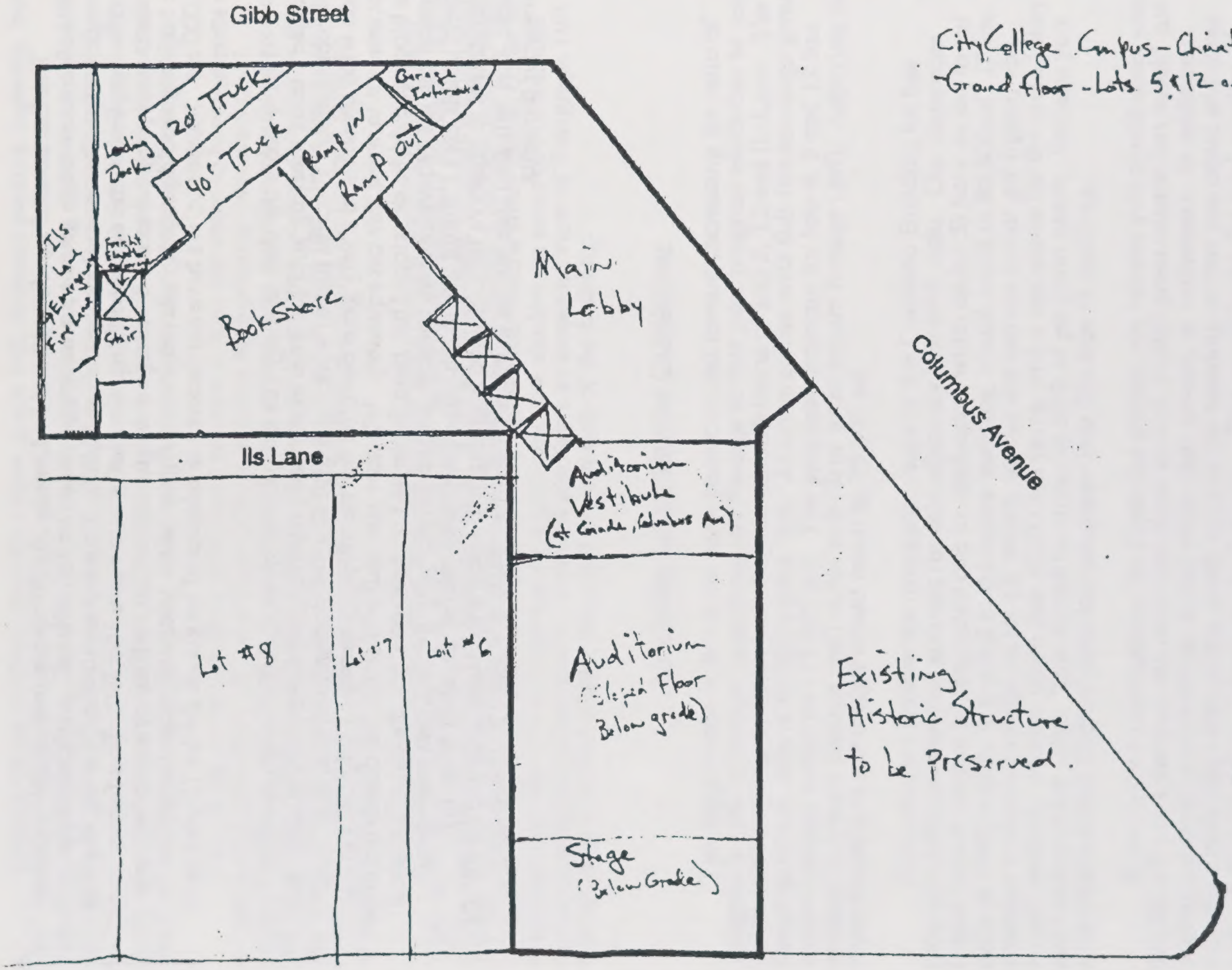
However, we believe the triangular shape of the Colombo Building lot has inherent inefficiencies that account for this relatively low 64% ratio. Our classroom floors (which cannot be optimized due to inadequate width on lot 5) have an asf to gsf ratio of 74%, which, if applied to the entire building, would result in 86,800asf. If you consider additional height on lot 12, which we did not include in our gsf figure, you would probably achieve more than 90,000asf (even with a deduction for the main lobby and loading dock area). This would be closer to 92% of program needs. Perhaps you could consolidate eight of your ten campuses into this type of building.

If you were to incorporate lot 6 into the project, we believe you would meet your 98,000 asf need, because the increased floor area of 16,000 gross square feet would not occasion a significant increase in hallways, stair towers, or bathrooms. In addition it would increase the width of the south wing of the building so that you could add three new 1,000 square foot classrooms to that area. This would bring the total number of classrooms and labs per floor to fifteen (one room more than indicated in your current building design).

5 The footprint of lots 5, 6, 12 and Ils Lane is 19,070 square feet. At seven stories with full site coverage gross square footage would be 133,490 gsf. Assignable square footage on the classroom floors would be 15,000. This represents a ratio of asf to gsf of 78.5%. Applied to the entire building, total asf would equal 104,790. This figure exceeds your program needs by a large enough amount that inefficiencies elsewhere in the building would probably not reduce this figure below your anticipated need for 98,000 asf. Moreover, we have not factored in additional height on the lot 12 portion of the structure.

I have taken the time to study this issue and propose specific design changes because I think meeting your program needs and preserving the Colombo Building are quite compatible. I would like to work out a deal that will accomplish this, and I have made what amounts to a very generous offer for the property because I think it is in our best interest to work this out equitably. Whether you realize it or not the debate over how this block should be developed has been fierce and unresolved since the days that Justin Herman ran the redevelopment agency. As the developer of the first redevelopment project in this area I would like to put this controversy behind us, and I think my commitment to preserve the Colombo Building will resolve the issue once and for all. Of course, this will also free you up to move forward with lots 5, 6 and 12. Please let me know your thoughts.

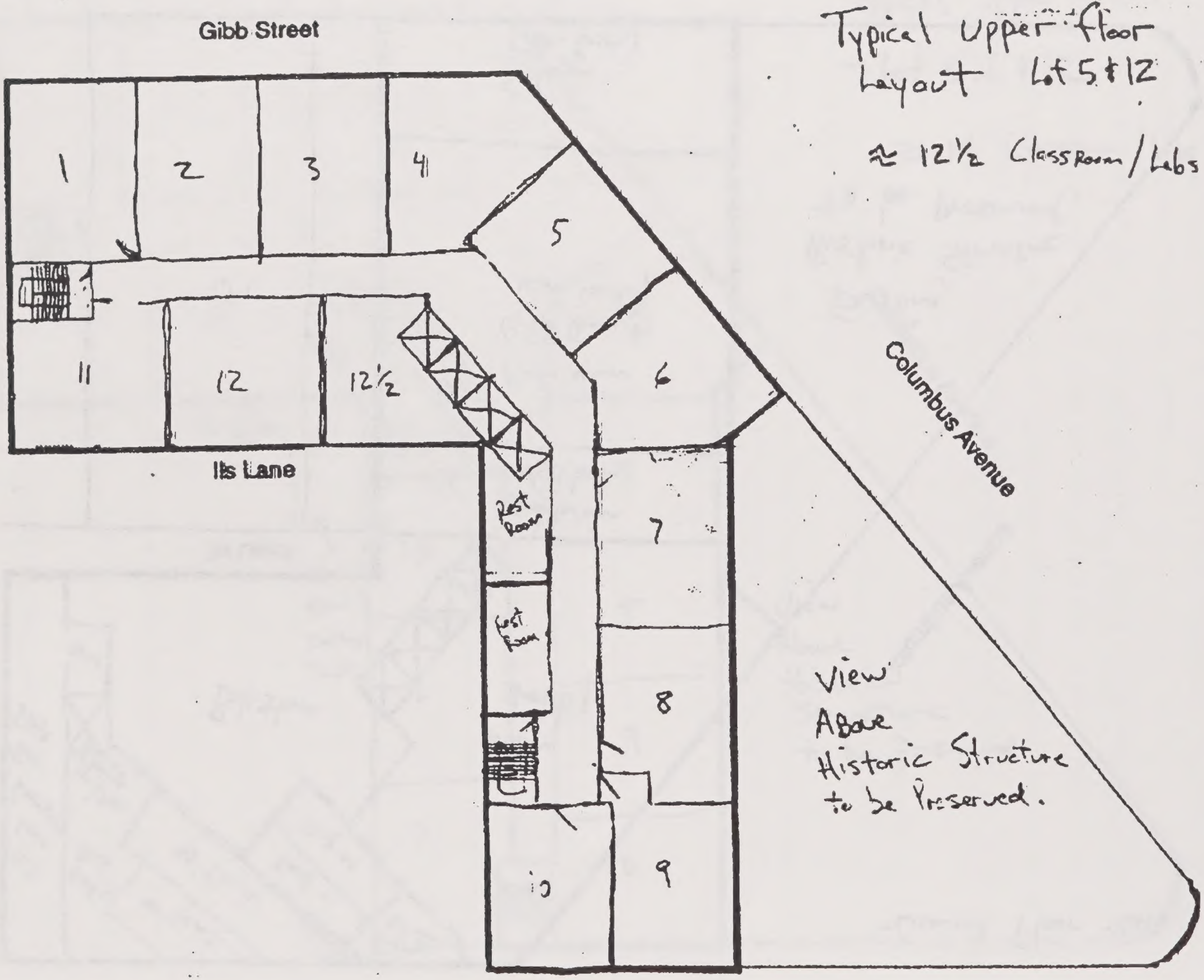
City College Campus – Chinatown/North B.
–Ground floor – Lots 5 & 12 only


Gibb Street
20' Truck
40' Truck
Loading Dock
Ramp IN
Ramp OUT
Garage Entrance
Ils Lane & Emergency Fire Lane
Freight Elevator Opening
Stair
Book Store
Main Lobby
Columbus Avenue
Ils Lane
Auditorium Vestibule (at Grade, Columbus Ave)
Lot #8
Lot #7
Lot #6
Auditorium (Sloped Floor Below grade)
Stage (Below Grade)
Existing Historic Structure to be Preserved.

Scale 1" = 20'

Typical upper floor
Layout Lot 5 & 12

≈ 12½ ClassRoom/Labs per floor


Gibb Street
1
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12½
Its Lane
Columbus Avenue
Rest Room
Rest Room
7
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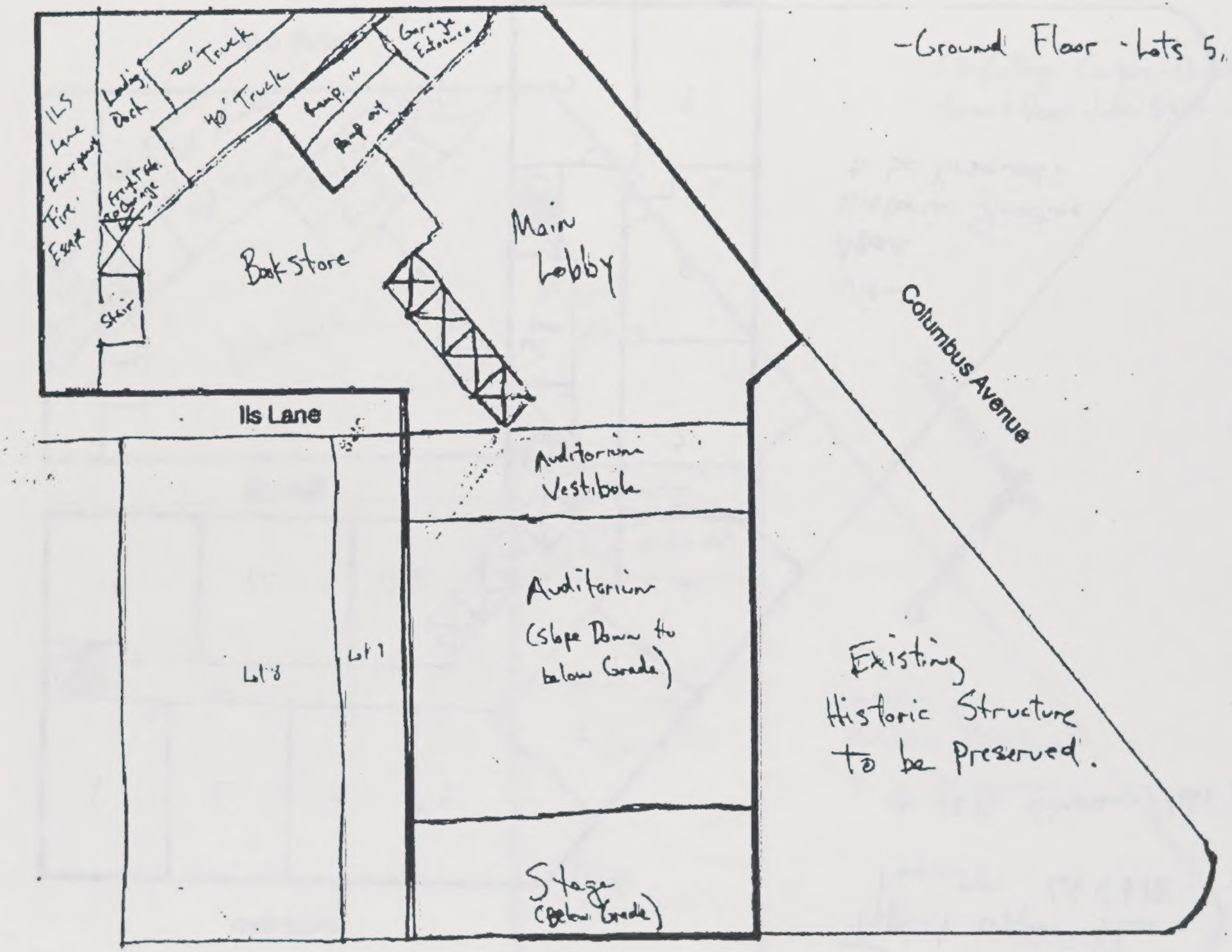
View
Above
Historic Structure
to be Preserved.

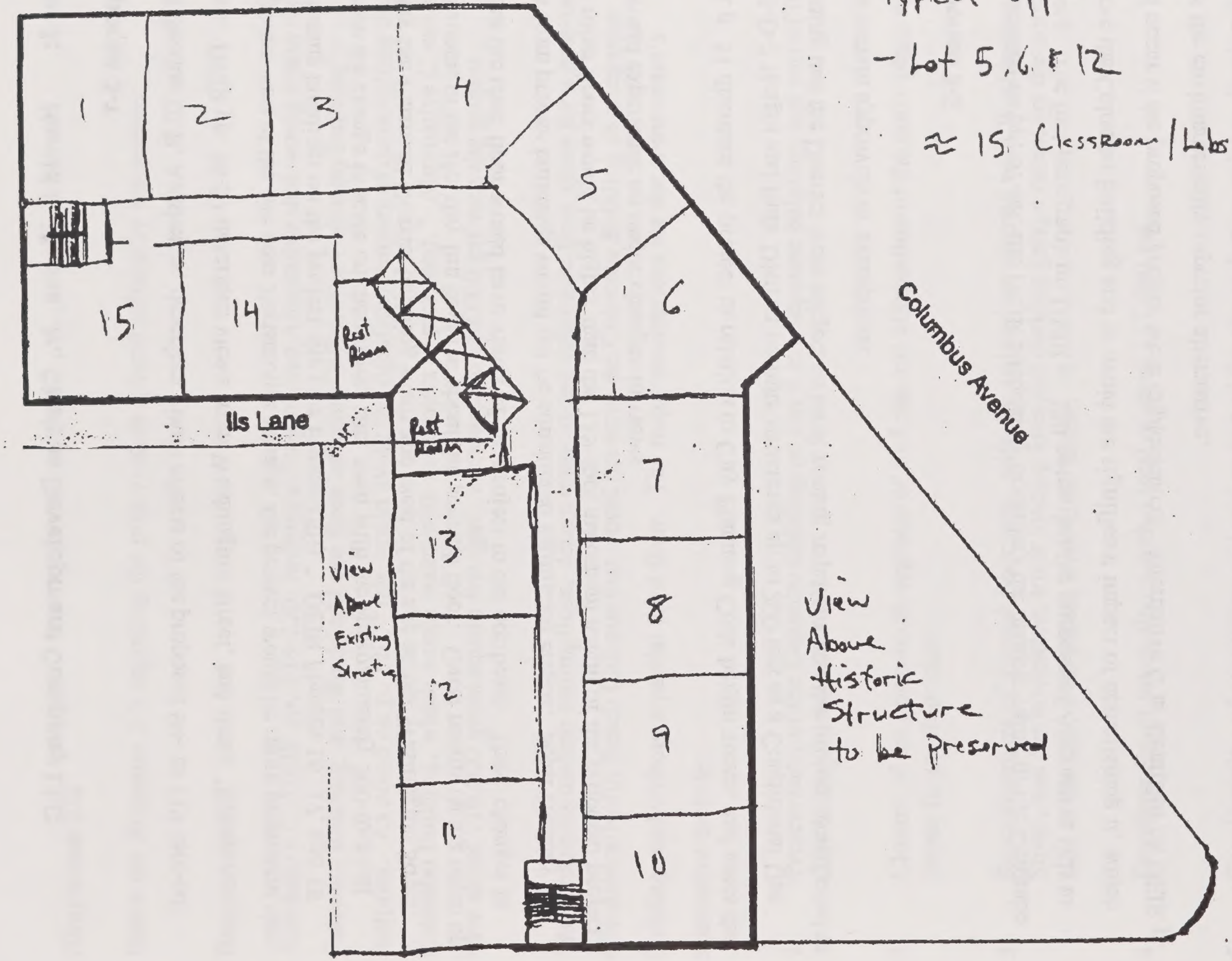
-Ground Floor -Lots 5, 6 & 12


ILS Lane Emergency Fire Escape
Loading Dock
20' Truck
40' Truck
Ramp in
Ramp out
Garage Entrance
Freight Elev. Recharge
Stair
Book Store
Main Lobby
Columbus Avenue
Ils Lane
Auditorium Vestibule
Auditorium (Slope Down to below Grade)
Lot 8
Lot 7
Existing Historic Structure to be Preserved.
Stage (Below Grade)

Typical Upper [illegible]

- Lot 5, 6 & 12

≈ 15 Classroom/Labs per Floor


1
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10
11
12
13
14
15
Rest Room
Rest Room
Ils Lane
Columbus Avenue
View Above Existing Structure
View Above Historic Structure to be Preserved

Letter 3: Harold L. Moose, Jr., Chelsea Development Company LLC

Response 3-1

DEIR Section III.B, Aesthetics, describes visual effects of the proposed 94- to 119-foot-tall project. DEIR pp. 56-57 describes views from Washington Street, and states "[f]rom viewpoints west of the site near Portsmouth Square, the project would be more prominent than the existing buildings on the project site (see Figure 18B)." DEIR Figures 16, 17, and 18 illustrate the change in scale on the project site, seen with the approximately 300-foot-tall Holiday Inn Financial District building south and west of the site across Washington Street. Guest rooms of the Holiday Inn begin at about the seventh floor. Guest rooms facing north up to about the tenth floor would have views of the project to the northeast. These changes in views from private buildings would not be considered significant effects. Most Holiday Inn guest room floors would be higher than the 119-foot maximum height of the proposed project, and would experience no major changes in views.

DEIR p. 51 discusses the project in relation to City Planning Code height zones, and notes that the 65-D-2 Height and Bulk District permits structures up to 200 feet as a Conditional Use. Assuming that the District were subject to local zoning requirements, the project would need to obtain certain approvals or exemptions.

Response 3-2

As discussed on pp. 67-68, the DEIR adequately considers the historic value of the Colombo Building. The first paragraph on DEIR p. 120 notes that the purpose of Alternative C is to preserve the Colombo Building and to avoid the significant impact of demolishing it, which would occur if the proposed project were implemented. Alternative C is identified on DEIR p. 123 as the environmentally superior alternative.

Response 3-3

Please see Responses 13-1, 13-2, and 13-3 regarding the loss of 21 units of residential housing and proposed mitigation measures to lessen this impact.

Response 3-4

Please see Response 3-5 regarding the preservation scheme offered by commenter.

Response 3-5

Alternative C, DEIR pp. 119-120, reviews a Preservation Alternative that would retain the Colombo Building, and would add one floor covering 75% of the Colombo Building's footprint. As noted on p. 120, "this would avoid the significant impact of demolishing the Colombo Building, which would occur with the project as proposed." Alternative C would have about 119,000 gross square feet (gsf), compared to 158,000 gsf with the project.

The comments outline assumptions, design changes and schematic floor plans for a proposed Chinatown/North Beach Campus that would preserve the Colombo Building as a separate building, and without a partial third floor. The major assumptions for the commenter's alternative include:

1. Preservation of the Colombo Building on Lot 4 as a separate building, not part of the City College project.
2. Closure of the north-south segment of Ils Lane and elimination of the entry plaza to create larger floor size.
3. Rearrangement of ground-floor uses, with the auditorium aligned with Washington Street, and the bookstore, truck loading area and parking garage ramps on the northerly side of the site, with access from Gibb Street.
4. Development of seven floors with a total of about 117,000 gsf.
5. Consideration of acquisition of Lot 6 as part of the site to further enlarge developable area.

Based upon a review by the project architects, the commenter's alternative raises several issues:

1. Closure of, and development on, Ils Lane could compromise life-safety exiting required by buildings on Lots 6, 7, and 8 fronting on Washington Street, and by the approved St. Mary's project on the west side of the project block. Required second exits for those existing and approved buildings open on to Ils Lane.

2. Placing the auditorium stage along the Washington Street frontage would create a blank wall at the street. The lack of windows and entry in this arrangement would "deaden" the pedestrian street frontages.

3. The automobile ramps shown on Gibb Street render the lower levels of Lot 12 inefficient for a parking layout. It would also be very difficult to achieve a reasonable turning radius for cars at the bottom of the ramps as shown. The truck loading bays do not appear to accommodate standard maneuvering room.

4. Although the bookstore would be primarily for students, there is an opportunity to provide some street-level activity on the college site by placing it in a more street-front oriented position. Positioning the bookstore in the back of the site would not meet these objectives.

5. The commenter's alternative would eliminate the multi-purpose room. This room serves a key function in the educational mission of the campus.

6. The commenter's alternative would eliminate the entry plaza on Columbus Avenue as a feature of the new campus.

7. Development of "double-loaded" classroom floors on the Lot 5 and Lot 6 portion of the site would create rows of classrooms with exposure on the west side. That frontage would be adjacent to lots that could be developed in the future, and those classrooms would be subject to lost light and air exposure. With the proposed design, classrooms would front on Washington Street, Columbus Avenue, or Gibb Street. While the

commenter's alternative assumes that the Colombo Building would be retained in its present two-story configuration, it is conceivable that future changes on that site could further "land-lock" development on Lot 5 and Lot 6. The classroom sizes shown schematically in the commenter's alternative appear to be smaller than classroom standards developed for the proposed project (either with use of Lot 5 or Lots 5 and 6). The comments also suggest that acquisition of Lot 6, a 2,100-sq.-ft. site west of Lot 5 (see DEIR Figure 2, Project Location, p. 22) would allow the commenter's alternative to have larger floor sizes and more closely meet the project's floor area needs. As part of planning for the Chinatown/North Beach Campus, the District reviewed the availability of Lot 6 (see DEIR p. 122). The owners of Lot 6 have not responded to inquiries about a sale, and the availability of Lot 6 is considered too speculative for further analysis. In addition, Lot 6 contains six apartment units, and development of that site would be an additional adverse effect on housing supply, as would occur with the project also.

8. The commenter's alternative would have a lower gross floor area (117,000 gsf) compared with the proposed project (158,000 gsf) or the DEIR Preservation Alternative, Alternative C, (119,000 gsf). The comments also suggest that the District could acquire Lot 6, an approximately 2,300 sq. ft. parcel, to develop a larger floor area without the Colombo Building site. This would be a building with about 133,000 gsf. This would assume that Lot 6 is available for purchase, which is considered speculative, as discussed above. The comments also discuss assignable floor ratios and totals. On the basis of the preliminary nature of the design submitted in the comment, it is not possible to verify these factors; it is reasonable to assume that the usable space would be generally proportionate to gross floor area.

4

LAW OFFICES
LAWLESS, HOROWITZ & LAWLESS
TRANSAMERICA PYRAMID
THIRTY-THIRD FLOOR
600 MONTGOMERY STREET
SAN FRANCISCO, CALIFORNIA 94111
TELEPHONE (415) 391-7555

April 27, 1998

Peter A. Goldstein
Office of the Board of Trustees
City College of San Francisco
50 Phelan Avenue, Box E200
San Francisco, California 94112

Dear Mr. Goldstein:

I am writing to oppose construction of a City College of San Francisco campus at the site at Columbus Avenue and Washington Street. My opposition is for four reasons.

First, the Colombo Building is an historic and architecturally significant building. Along with the historic Transamerica Building across the street, the Colombo building perfectly frames the beginning of Columbus Avenue. 1

The large majority of the original historic buildings in San Francisco have been torn down over the years. There are many sites where City College could build a new campus without tearing down a beautiful historic building. 2

Second, destruction of additional housing at Columbus Avenue and Washington Street should not be allowed. The International Hotel, in the same area, was demolished and its demolition helped destroy an entire community. It is my understanding that the landowners who would profit from sale of this property are the same ones who destroyed the International Hotel and then left the lot vacant for decades. The housing shortage in San Francisco should not be made worse. 3

4 Third, construction of a 119 foot high building at this location is inappropriate. Such an action would inevitably lead to demolition of additional buildings in Chinatown and North Beach in order to build modern mid-rise and high-rise buildings. So far, such development has been allowed only south of Washington Street.

Once one tall modern building is constructed north of Washington Street, where and how will any line be drawn to stop further demolition and construction? Given the shortage of office space in the Financial District, you can bet that Chinatown and North Beach would be slated for more tall office buildings.

5 Fourth, bringing thousands of more people to this area every day would have an awful environmental impact. Mass transit is already horrendously crowded in this area. Parking in this area is about the worst in The City. Traffic is often near gridlock. Bringing thousands of more people to the area will make things even worse.

For whatever it is worth, this is the first time I have ever written to oppose a development project. I represent unfairly fired workers for a living.

I support the work of City College very much. It would be a shame if the College were to destroy an historic building, contribute to causing gridlock in one of the most congested parts of The City, throw people out of their homes, and begin a tide of further demolition. Please look for another site instead.

Very truly yours,

Phil Horowitz

Letter 4: Phil Horowitz, Attorney at Law, Lawless, Horowitz & Lawless

Response 4-1

Please see Response 9-38 regarding the North Beach gateway.

Response 4-2

Alternative sites previously considered for the Chinatown/North Beach Campus, and the reasons why those sites were rejected from further consideration in favor of the proposed campus location, are described in Chapter V, Alternatives, of the DEIR, pp. 120-123. In the course of planning for facilities needs for the Chinatown/North Beach Campus, District staff reviewed the availability and suitability of 31 sites for the proposed campus. The criteria and objectives used in selecting a site for the proposed campus are noted on pp. 17 and 18 of the DEIR.

Response 4-3

This comment expresses opposition to an aspect of the project. Expressions of support or opposition to a proposed project do not by themselves address the content or adequacy of the DEIR, and no response is required under CEQA. However, such comments will be reviewed and considered by the District when the Board decides whether to approve the project. Please see Responses 13-1, 13-2, and 13-3 regarding the loss of 21 units of residential housing and proposed mitigation measures to lessen this impact.

Response 4-4

As discussed on p. 44 of the DEIR, the project site is in a 65-D-2 Height and Bulk District, which permits buildings with heights above 65 feet to a maximum of 200 feet as a Conditional Use from the City Planning Commission. While the proposed structure would exceed the 65-foot height limit, assuming the District were subject to local zoning requirements, the project would need to obtain certain approvals or exceptions from the City and County of San

Francisco. As discussed on DEIR p. 51, height and bulk requirements under Section 271, Bulk Limits: Special Exceptions, in Districts Other Than C-3, Section 271 states that deviation from bulk limits could occur if:

> "(1) Achievement of a distinctly better design, in both a public and private sense, than would be possible with strict adherence to the bulk limits, avoiding an unnecessary prescription of building form while carrying out the intent of the bulk limits and the principles and policies of the Master Plan.
>
> "(2) Development of a building or structure with widespread public service benefits and significance to the community at large, where compelling functional requirements of the specific building or structure make necessary such a deviation."

Exceptions to height limits would also be reviewed under Section 309, as a conditional use which also provides criteria based on design considerations and public benefits. Thus, City controls provide for review and potential approval of the project as designed.

With regard to demolition of additional buildings in Chinatown and the North Beach area, any future private development would be subject to existing planning and zoning controls. It should also be noted that the City has already approved an 8-story office tower and, in the alternative, a 7-story residential tower on this site, which could be built by a private developer who purchased the property. See discussion in the DEIR at pp. 34-36. In addition, a 15-story housing tower has been approved for the northwest section of the block, and construction is expected to begin this year (see DEIR, p. 35).

Response 4-5

Pages 71-91 in Section III.D, Transportation, of the DEIR address the project's effects on transit, parking, and traffic. As stated in the Transit impact analysis on pp. 84 and 85 of the DEIR, capacity utilization for all screenlines ranges from 50% to 73%, which means that the lines have the capacity to accommodate additional passengers. The impact analysis found that ridership would increase by a maximum of 218 riders on the screenline experiencing the greatest increase, and the other screenlines would have smaller increases in ridership. Overall, the project would cause Muni system capacity utilization to increase from about 70% to 71%, which would not be a significant environmental effect. While the transportation analysis found that the project would have a parking shortfall of about 105 spaces, parking shortfalls are not considered a significant physical impact on the environment (p. 83 of the DEIR). The traffic impacts analysis found that the addition of project-related trips to intersections in the vicinity of the project would have little or no effect on the intersection Level of Service (LOS) at intersections in the study area. These intersections would continue to operate at LOS B (pp. 81-82 of the DEIR). The transportation analysis concluded that the project would not cause any significant environmental impacts.

5

ASIAN LAW CAUCUS

May 18, 1998

Peter Goldstein
Chief Operating Officer
City College of San Francisco
33 Gough Street
San Francisco, CA 94103
FAX: 239-3918

RE: Chinatown/North Beach Campus, Draft EIR

Dear Mr. Goldstein:

We have reviewed the Draft EIR for the proposed campus on Columbus Street. While we are very supportive of the general concept of the project, we are concerned that the draft completely fails to address the needs of the present residents of the Fong Building, which will be demolished by the project. The project as proposed also fails to adequately address the need for relocation assistance. We are concerned therefore that the entire project may be delayed or disrupted if these needs are not addressed as required by law.

1

As the draft EIR notes, the proposed project contemplates the demolition of a 21-unit apartment. That building is presently occupied by long term residents of the Chinatown community, most of whom are elderly and on fixed incomes. Yet the EIR nowhere addresses the need to relocate those residents. The California Relocation Assistance Law (CRAL), Government Code §7260, et seq., requires that prior to taking any steps to proceed with a project which will result in the displacement of residents, an agency receiving state funding must prepare a plan for the relocation of those residents.

The CRAL further requires that where comparable affordable housing cannot be located in the surrounding community then the public agency must provide for replacement housing before the project may proceed.

2

720 MARKET STREET, SUITE 500 SAN FRANCISCO, CALIFORNIA 94102
Telephone: (415) 391-1655 / FAX: (415)391-0366

2 From our initial assessment of the needs of the resident and given the present housing crisis in San Francisco, it is apparent that no comparable housing exists for the current residents of the Fong Building. Therefore, state law requires that the agency plan for replacement housing in the area.

3 The present draft EIR does discuss the topic of replacement housing. But the proposed mitigation, *student* and *faculty* housing on Treasure Island, fails to fall within any reasonable definition of the concept of "replacement housing." The housing on Treasure Island will not be available or affordable to the displaced residents, nor will it be geographically accessible to them.

4 It is our view that the EIR must not only address the need for relocation assistance and replacement housing, it must also identify potential sites for replacement housing and the general manner in which that housing will be made available to the present residents of the Fong Building.

There are additional requirements imposed by the CRAL which apparently have not been complied with. We merely raise the issues of relocation and replacement housing as the most obvious deficiencies. We would be happy to discuss with your staff the range of other issues with the hopes that an amicable solution can be reached for all concerned.

Sincerely,

GEN FUJIOKA
Attorney at law

Letter 5: Gen Fujioka, Attorney at Law, Asian Law Caucus

Response 5-1

Please see Responses 13-1, 13-2, and 13-3 regarding the loss of 21 units of residential housing and proposed mitigation measures to lessen this impact, including relocation assistance. The District would comply with all legal requirements of the California Relocation Assistance Act.

Response 5-2

The District would comply with all legal requirements of the California Relocation Assistance Act, including determining the availability of comparable housing. The District has retained a relocation assistance consultant.

Response 5-3

Please see Response 13-3 regarding the Treasure Island mitigation and other proposed mitigation measures to lessen housing impacts associated with the project.

Response 5-4

Regarding the EIR's discussion of the loss of housing, see Responses 13-1 and 13-2. Because the project would not be constructed for two to four years, approval of the project would not result in the immediate displacement of any tenants. Please see Response 13-3 regarding replacement housing. The District would prepare a relocation plan and provide relocation assistance to all individuals and businesses displaced as a result of the project, pursuant to the California Relocation Assistance Act, California Government Code section 7260 et seq. Such assistance would include help in locating replacement housing for displaced tenants.

CAA
華人權益促進會
CHINESE FOR
AFFIRMATIVE
ACTION

May 19, 1998

City College of San Francisco
Chancellor Del Anderson & Board of Trustees
50 Phelan Ave. E200
San Francisco, CA 94112

Dear Chancellor Anderson and Members of the San Francisco Community College Board,

For the past twenty-nine years, Chinese for Affirmative Action (CAA) has worked, out of our Chinatown office, to promote equal rights and access to education and employment for Asian Americans, women and other people of color. As a civil rights advocate and employment training and placement organization, CAA supports the proposed City College of San Francisco campus to be built on the corner of Washington and Columbus. As a historically underserved community, Chinatown is in dire need of the educational and vocational opportunities a new campus would offer. A permanent, state of the art educational facility would be invaluable to the long-term growth of the Chinatown/North Beach community. CAA urges the Board of Trustees to consider the following reasons to decide in favor of establishing a permanent campus at the proposed site:

Accessible facilities for people with disabilities--Steep hills and old buildings make Chinatown a notoriously inaccessible neighborhood for people with disabilities. The nine dispersed campus locations that currently comprise the City College system in Chinatown/North Beach are not fully accessible. Because it is difficult to make older buildings fully accessible, we support the decision to build a new campus facility. A new, centralized City College campus would ensure compliance with the Americans with Disabilities Act and finally offer people with disabilities equal access to education. The Washington and Columbus site is also desirable because of its proximity to public transportation.

Expanded course offerings and vocational training opportunities—Inadequate classroom space and lack of capacity have kept City College from providing the full range of educational services to Chinatown/North Beach residents. Currently, the demand for English as a Second Language (ESL) classes is overwhelming the City College Chinatown/North Beach campus. Interested students must wait several months before they can begin classes. Establishing a new campus gives City College the necessary resources to effectively serve the large number of interested students.

17 Walter U. Lum Place • The Kuo Building San Francisco CA 94108 415·274·6750 Fax 415·397·8770

An expanded campus is also necessary in order to accommodate the new demands being placed on the City College system by welfare reform and CalWORKs. The City and County of San Francisco has designated City College as the primary educational institution that will provide training to welfare recipients. Under the strict requirements mandated by new federal welfare laws, not only will there be more people interested in ESL and vocational training programs, but there will be an increased need for the two types of programs to be integrated. Quality vocational training coupled with English language skills are crucial to securing a livable wage job. We hope that the centralized campus will facilitate more collaborations between the ESL classes and the vocational training programs. We believe that language and vocational programs that are closely integrated are the key to viable jobs and will lay the foundation for life long learning.

New Childcare center--A new childcare facility operating as part of the campus would be invaluable in increasing access to training and educational opportunities for working families and parents. Accessible and affordable childcare is often the deciding factor in a parent's decision to accept a job or pursue a particular course of study. A childcare facility on the campus would give working and single parents the option of enrolling in classes while having their children close by.

1 ***Lack of impact on traffic conditions***—Any new development that would attract large numbers of people to Chinatown has the potential to create large traffic gridlocks. According to the environmental impact report, the proposed site at Washington and Columbus offers accessibility via car, foot, bicycle and public transit with no significant impact to traffic conditions.

Chinese for Affirmative Action applauds the Community College District's commitment to increasing educational and vocational resources in the Chinatown/North Beach neighborhoods. We urge you to decide in favor of establishing a permanent Chinatown/North Beach campus on the corner of Washington and Columbus streets.

Sincerely,

Theodore H. Wang
Interim Executive Director

Letter 6: Theodore H. Wang, Interim Executive Director, Chinese for Affirmative Action

Response 6-1

The comment is supported by the Transportation impact analysis on pp. 77-91 of the DEIR. No significant transportation impacts were found in the analysis.

7

Chinatown Community
Development Center
華埠社區協進中心
社區

May 15, 1998

City College of San Francisco
Chancellor Del Anderson & Board of Trustees
50 Phelan Avenue, E200
San Francisco, CA 94112

RE: Proposed City College of San Francisco's new Chinatown/North Beach campus

Dear Chancellor Anderson and Members of the City College of San Francisco Board of Trustees:

The Chinatown Community Development Center (Chinatown CDC) would like to express our support for the proposed City College of San Francisco Chinatown/North Beach campus on the corner of Washington and Columbus Streets.

The City College Chinatown/North Beach campus is an important institution for our community, providing access to and opportunities for educational advancement to many of the immigrant and low-income residents in the Chinatown/North Beach area. We are excited about the proposed new campus which would offer state of the art computer technology, an increased number of English as a Second Language courses, and more vocational training opportunities. In addition, we anticipate that the new campus, with its library, auditorium, and multi-purpose rooms would be available not only to its students and faculty, but to the community at large for public meetings and community events. By expanding its class offerings and job training programs, and providing childcare and accessibility for people with disabilities, the proposed new campus, close to public transportation, will be able to serve a larger population and meet the growing needs of the Chinatown community. We applaud the City College Board of Trustees' decision to establish a permanent campus in Chinatown.

While the need for more educational and vocational resources for our community is, indeed,
great, we trust that the Board is also mindful that affordable housing, given its short supply and
immense need, is of the utmost importance to the Chinatown community. With the demolition 1
of 21 units of housing at the Fong Building being proposed, we do expect the Board to look
seriously at incorporating affordable replacement housing either on-site or off-site within the
Chinatown/North Beach area. In addition, given the difficulties of finding affordable housing,
City College would need to provide adequate relocation assistance to the Fong building's
existing residential tenants, whom we believe are mostly low income. Such provisions are 2
necessary in order to adequately mitigate the loss of affordable housing to the community and the
subsequent displacement of low income tenants.

We look forward to continued discussions and working closely with City College and the community to achieve a successful new Chinatown/North Beach campus.

Sincerely,

Gordon Chin
Executive Director

1525 Grant Avenue · San Francisco, California 94133-3323
415.984.1450 · FAX 415.362.7992 · CRS 800.735.2929
formerly Chinatown Resource Center and Chinese Community Housing Corporation

Letter 7: Gordon Chin, Executive Director, Chinatown Community Development Center

Response 7-1

The DEIR recognizes the short supply of affordable housing in the project area. Please see Response 13-3 regarding mitigation measures relating to replacement housing.

Response 7-2

Please see Response 13-3 regarding the provision of relocation assistance to displaced tenants.

8

TENDERLOIN HOUSING CLINIC
Main Office: 126 Hyde Street
San Francisco, CA 94102
(415) 771-9850
FAX (415) 771-1287

RANDALL M. SHAW
STEPHEN L. COLLIER
TIMOTHY J. LEE
RAQUEL FOX

May 15, 1998

VIA FAX

Office of the Board of Trustees
City College of San Francisco
50 Phelan Avenue
Box E200
San Francisco, California 94112
Fax 239-3918

RE: Draft EIR, Chinatown/North Beach Campus

Dear Board Members:

I urge you to reconsider plans to demolish 21 residential housing units and displace 50 residents from the Fong Building at 55 Columbus Avenue.

As the Draft EIR concedes (page 50), demolition of the Fong Building would have a significant environmental impact and is inconsistent with the San Francisco Planning Code. Demolition without replacement housing also violates the City's Residence Element of the Master Plan, Proposition M, and virtually every other written housing policy in the City. 1

The Draft EIR acknowledges that City College's participation in the Treasure Island Consortium does not address the significant impact caused by the demolition of the 21 affordable housing units. In truth, the District's participation in the Treasure Island Consortium has nothing to do with the elimination of 21 units in Chinatown. Your involvement in securing housing for your faculty and students on Treasure Island does not mitigate the loss of these units. 2

Having worked to preserve affordable housing in San Francisco since 1980, I am familiar with the myriad justifications advanced for displacing tenants and demolishing their homes. To allow such displacement within the shadow of the former International Hotel would prove that we learned nothing from that tragedy. 3

City College should either acquire a different site or replace the units with new construction somewhere else in China-

3 ↑ town. In the latter case, the District must provide the displaced tenants with rent subsidies so that their housing costs are not increased pending the completion of their new homes.

If our office can be of any assistance in resolving this issue, please let me know.

Sincerely,

Randy Shaw
Executive Director

RS/rh

Letter 8: Randy Shaw, Executive Director, Tenderloin Housing Clinic

Response 8-1

Please see Responses 13-1 and 13-2 regarding the project's consistency with the City's Planning Code and housing policies.

Response 8-2

Please see Response 13-3 regarding the Treasure Island mitigation measure.

Response 8-3

Please see Response 13-3 regarding the replacement of housing and relocation assistance benefits.

[NOTE: Exhibits submitted with letter are available for review at the District Administrative Office at 33 Gough Street.]

9

Friends of the Colombo Building
470 Columbus Ave. Suite 206, San Francisco, CA 94133

Committee to Stop Downtown Sprawl
P.O. Box 26709, San Francisco, CA 94133

May 23, 1998
via Certified Mail (P 274 230 900) and facsimile (415/241-2344)

Peter A. Goldstein
Chief Operating Officer
City College of San Francisco
33 Gough Street
San Francisco, California 94103

RE: Comments on Draft Environmental Impact Report
(State Clearinghouse No. 989031039)
City College of San Francisco Chinatown/North Beach Campus

To whom it concerns:

Thank you for considering and responding to the following comments made on behalf of Friends of the Colombo Building and the Committee to Stop Downtown Sprawl with regard to City College of San Francisco's (College) Draft Environmental Impact Report (DEIR) published April 23, 1998.

Friends of the Colombo Building and the Committee to Stop Downtown Sprawl are unincorporated associations of San Francisco residents formed to protect and preserve the National Register eligible Colombo Building, the Jackson Square Historic District, and their historic environs, and to preserve the small-scale historic character of Chinatown, North Beach and Jackson Square.

I. THE PROJECT DESCRIPTION IS SERIOUSLY FLAWED.

1 A. **The College DEIR fails to accurately describe the project as an amended Planned Unit Development (PUD) and is segmenting its CEQA review by focusing solely on a portion of the project (Site B) with no intent to review the environmental impacts of the changed project as a whole**. The development of Site B is connected to Site A in the PUD approval[1], and its development is relied upon by the City and

---

[1] San Francisco City Planning Commission Motion No. 11070 adopted July 9, 1987, approved a Conditional Use Authorization for a PUD for new construction of 120 low-income housing units on Site A and an office and retail building on Site B; San Francisco City Planning Commission Motion No. 14254 adopted December 12, 1996, approved a Conditional Use Authorization for an amended PUD for construction of a reduced number (104) units of low-income housing on Site A and for construction of 46 units of market-rate housing on Site B.

1 County of San Francisco (City) in its approval of the Site A portion of the project. The College plans to purchase Site B with the PUD intact, and yet, as stated in the DEIR, plans to develop Site B for a college campus inconsistent with the PUD to such an extent that the College intends to seek an exemption from the City's PUD requirements. This dual approach compromises the EIR process. At this point in time, the PUD is in place and environmental review must encompass an amended PUD for the entire project.

2 Although the DEIR states that the final EIR will be relied upon by the College in making its decision to exempt the project from the City's zoning requirements, it fails to accurately describe the requirements and conditions of the approved PUD, including the required mitigation measures, to which the site is currently subject, including, for example, requirements relating to providing open space, making payments of an in lieu affordable housing fee, special design restrictions, and transportation requirements such as accommodating tour bus parking. These PUD requirements and conditions are more specific than the requirements of the City's General Plan and Planning Code discussed below.

3 We enclose herewith for consideration and inclusion in the EIR in this regard the City Planning Commission Motion No. 14254, adopted December 12, 1996 (Exhibit A) and the recorded Notice of Special Restrictions Under the City Planning Code recorded on March 20, 1997 as Instrument No. G134868 (Exhibit B), which clearly do not permit the use of Site B for a college campus. We also enclose for consideration and inclusion a copy of the Conditions on Permit No. 8714212's Effectiveness dated May 16, 1988, by Robert W. Passmore (Exhibit C) and the recorded Memorandum of Demolition Permit Condition and Restriction dated May 11, 1988 (Exhibit D), executed by Four Seasons Corporation (now Pan Magna Group). Each of these documents evidence the clear connection between the development of Site B and the previously approved PUD which necessitates an amended PUD as to the development of Site B for a college campus.

1. Based on the information provided is Site A not a part of the PUD?
2. Will the current City approvals allow for the development of Site B for a college campus?
3. Will the EIR be amended to describe and review the environmental impacts of the project as an amended PUD?
4. Will the City or City College seek to amend the PUD project approvals?
5. If not what is the basis, in light of the information here, for considering only a segmented portion of the PUD?

B. The DEIR fails to accurately describe and consider the campus project's relationship to the federally funded housing project proposed for Site A. The City's Motion No. 14254 approving the PUD declared that the "federal undertaking" is the entire scope of the project including both sites:

> "The proposed senior housing on Site "A" component would be funded by the U.S. Department of Housing and Urban Development (HUD), and therefore the project will undergo federal environmental review as required by the National Environmental Quality Act (NEPA). This additional environmental review includes Section 106 review pursuant to the National Historic Preservation Act of 1966. Because Sites "A" and "B" are part of a single PUD, Section 106 deems the federal undertaking to be the entire scope of the project including new construction on both sites." (Motion No. 14254, page 17).

In addition, the City's *Kearny Street/Columbus Avenue Project Final Supplemental Environmental Impact Report*, Planning Department File No. 94.615E, State Clearinghouse No. 86031123, for the amended PUD project, certified by the Planning Commission on December 12, 1996 (1996 SEIR), contains the following statements:

(1) the construction of the new building on Site B (either
the office/retail building or the market-rate residential 4
building) is intrinsically linked to the development of the low-
income housing on Site A (by allowing the development on Site A
to subsidize the affordable housing);

(2) the subsidized housing on Site A, which is dependent on a below-market value land purchase price, would not be financially feasible without the proposed commercial development of Site B; and

(3) because the project proponent has linked Sites A and B, Section 106 of the National Historic Preservation Act (NHPA) deems the federal undertaking to be the entire scope of the project including new construction on both sites, and, therefore, that HUD will analyze and enter into a Memorandum of Agreement (MOA) to address the demolition of the Colombo Building, the impacts to archaeology on Sites A & B and the design compatibility of the new construction on both sites. (1996 SEIR, C&R.43).

The construction of a new building on Site B (whether the approved office/retail building or the market-rate residential building *or the proposed college campus*) is intrinsically linked by the PUD approval to the development of the low-income housing on Site A

4 and, therefore, the College's proposed development of Site B would constitute an amended federal project subject to the federal Section 106 review as to the impacts to archaeology of the construction activities, the demolition of the Colombo Building and the architectural and design compatibility of any replacement structure with the nearby historic resources. This relationship to the federal project must be accurately disclosed in the College EIR and taken into consideration.

The College acknowledges this federal link between Sites A and B in its Agreement of Purchase and Sale dated May 6, 1997, between Pan Magna Group and San Francisco Community College District, as first amended on October 31, 1997, and second amended on March 30, 1998 ("Purchase Agreement"). For example, the College's conditions to closing escrow on Site B include: 1) the transfer by Pan Magna Group of title to the "Site A component" to the low-income housing sponsors, 2) the preparation of a NHPA Section 106 Memorandum of Agreement on the federal undertaking, and 3) the preparation of historic documentation on the Colombo Building, each as provided in the City's Motion No. 14254 approving the PUD. A copy of the Purchase Agreement, including the two amendments, is enclosed with this letter as Exhibit E for inclusion and consideration in the DEIR.

The College further acknowledges the federal nature of the project and the link between Sites A and B in that the College is proposed to be a concurring party to the NHPA Section 106 Agreement to be entered into between the Department of Housing and Urban Development (HUD), the City, and the State Historic Preservation Officer. For inclusion and consideration in the DEIR, we enclose with this letter a copy of the current draft of the Section 106 Agreement as Exhibit F together with our letters dated March 30, 1998 and May 8, 1998 commenting on the draft Section 106 Agreement as Exhibit G.

1. Is the development of a campus project on Site B not linked by the PUD to the federal project?
2. Will the project description be changed to accurately set forth the campus project's relationship to the proposed federally funded project on Site A?
3. Will the EIR be amended to include the College's involvement in the Section process as a concurring party?

5 **C. The Intended Uses of DEIR are not adequately set forth; the DEIR will not be adequate for its Intended Uses**. Section II.G of the DEIR (pages 36 & 37), in setting forth the intended uses of this EIR, states that this EIR may be used by various public agencies in granting subsequent approvals for the project, including appropriation by the San Francisco Board of Supervisors of Measure A bond proceeds for site acquisition and any other approvals which may be needed from the City. Unless

this EIR properly analyzes the amended PUD including the College's proposed use of Site B, the EIR will be not be legally adequate for use by the City. The City cannot issue bonds or grant any other approval for the College project inconsistent with its approved PUD and certified 1996 SEIR. 5

The following statement is contained in the DEIR: "While the District [College] has not passed a formal resolution exempting the project from local zoning ordinances, it is likely that the District will take such action in the future, because the proposed project is in conflict with local zoning regulations ***related to demolition of housing***." (emphasis added) (DEIR, page 37). What does this mean? Why does the DEIR fails to mention here the numerous other conflicts that the proposed project would have with the regulations contained in the City Planning Code such as, for example, limitations related to height, bulk, lot size, use size, street frontage, sun access setbacks, rear yard/site coverage, open space requirements, maximum street coverage per building, off-street freight loading, parking, and numerous others? 6

The fact that the College states in this DEIR that it will likely exempt itself from local zoning laws does not relieve the College of its obligations under CEQA to accurately and fully describe the proposed project, the affected environment, and the relationship of the project to all of the local planning and zoning regulations, including the specific conditions and requirements of the PUD to which this project site is subject, and to fully and in good faith consider the proposed project's environmental impacts, alternatives and mitigation measures.

Nor does the fact that the College may decide to exempt itself from local zoning laws relieve the City of its obligations under CEQA to consider an amended PUD and a supplemental EIR for this purpose. And clearly the DEIR is inadequate for the purpose of the City amending the PUD since it does not consider an amended PUD project.

As discussed above, because the PUD has linked the Site B development to the federally funded housing project on Site A, the entire project will undergo federal environmental review as required by NEPA. Section 15222 of the CEQA Guidelines provides as follows: 7

> "If a Lead Agency finds that an EIS...for a project would not be prepared by the federal agency by the time when the Lead Agency will need to consider an EIR..., the Lead Agency should try to prepare a combined EIR-EIS...To avoid the need for the federal agency to prepare a separate document for the same project, the Lead Agency must involve the federal agency in the preparation of the joint document. This involvement is necessary because federal law generally prohibits a

> federal agency from using an EIR prepared by a state [or local] agency unless the federal agency was involved in the preparation of the document."

7 This is an opportunity for using this EIR to fulfill all of the federal and state environmental review requirements in one document. Why hasn't the DEIR been drafted to serve the federal aspects of the project? Will a combined EIR/EIS be prepared? If not, why not?

8 D. The College is not the appropriate Lead Agency. As pointed out above, because Site B is a part of a PUD including both Sites A and B, the College's proposed campus development on Site B will require City action to amend the PUD. In addition, since Sites A and B are both parts of a single PUD and federal funding for any portion of the project cannot be made available until there are valid local government approvals in place, the City is required to take an action to amend the PUD as to the campus development on Site B before the federal funding can be made available to the low income housing portion of the PUD project. As pointed out above, the required NEPA review of the amended PUD project should be accomplished through a combined EIR-EIS with the involvement of HUD. Further with regard to the federal funding, the City, as a "Certified Local Government," is a participant in the NHPA Section 106 review which requires the City to approve and enter into the Section 106 Agreement which obligates the City to perform certain activities regarding the historical and cultural resources on Sites A and B. And, as pointed out above, the City will be required to approve the Measure A bonds for the College's acquisition of Site B and to consider the College's other requests for approvals under the Planning Code. In addition, as to the College's stated intention to exempt itself from the zoning ordinances of the City and County of San Francisco (under Government Code Section 53094), the City has the right to act under this provision to petition the superior court to determine if the College action exempting itself is arbitrary and capricious. Each of these above-described actions to be taken by the City will require the City to amend the PUD project and will be subject to environmental review under CEQA. Clearly the City not the College is the appropriate lead agency under CEQA.

In spite of the magnitude of City's involvement in this project, the DEIR does not even list the City as a "Responsible Agency." This appears to be a major oversight and defect in the DEIR. Why is the City not a Lead Agency in the preparation of this EIR? How can the City rely on this EIR for the purposes enumerated above if it is not a Lead Agency or even a Responsible Agency? Will the DEIR be changed to address this defect?

II. THE DEIR CONTAINS NO DISCUSSION OF THE COLLEGE'S INSTITUTIONAL MASTER PLAN IN SUPPORT OF THE NEED FOR THE PROJECT AND THE PROJECT OBJECTIVES.

Section 304.5 of the City's Planning Code requires each post-secondary educational institution to have on file with the Department of City Planning a current institutional master plan describing the existing and anticipated future development of that institution. Enclosed with this letter as Exhibit H is a copy of Planning Code Section 304.5 setting forth all requirements in this regard. The College EIR should refer to and incorporate the College's institutional master plan and discuss it application to the proposed Chinatown/North Beach Campus project. When was the College's institutional master plan first adopted? When were the required status reports and two-year updates were filed with the City's Department of City Planning? What environmental review was conducted in connection with its original adoption and updates? Does it discuss the proposed Chinatown/North Beach Campus project? 9

The EIR should include information as to when the College's institutional master plan was first adopted. What changes, if any, were made by the updates? The EIR also should summarize and discuss the contents of the institutional master plan, in particular how the plan meets the requirements of Section 304.53(c)(3)(A)-(D), and explain how the proposed campus project is in conformity with the College's current institutional master plan. The EIR should also indicate that the College's institutional master plan is available for public review at specified locations. Where is it available for review?

III. THE DISCUSSION OF THE AREAS OF CONTROVERSY IS INADEQUATE.

Because of the adverse impacts that would result to the Colombo Building and to surrounding historic districts and to nearby individually significant buildings, this is an extremely controversial project which has garnered extensive media coverage, is the subject of pending litigation and enjoys a wide level of public interest. Why doesn't the DEIR contain any mention of the pending lawsuit against the College and the City and County of San Francisco (*Friends of the Colombo Building, et al. v. Del M. Anderson, Chancellor of the San Francisco Community College District, et al.* (U.S.D.A., N.D. Cal., Case No. C-97-04679-JL)) concerning the environmental review of the campus project and the validity of the existing PUD? Why doesn't the DEIR mention the on-going controversy over HUD's compliance with the National Historic Preservation Act (NHPA) and the National Environmental Policy Act (NEPA) and the connection of the development of Sites A and Site B to HUD's proposed funding of a portion of the development of the single PUD project? A copy of the complaint 10

10 filed in the lawsuit (Exhibit I) is enclosed for consideration and inclusion in the College's EIR.

IV. THE ENVIRONMENTAL SETTING HAS NOT BEEN ADEQUATELY DESCRIBED; THE ENVIRONMENTAL IMPACTS HAVE NOT BEEN ADEQUATELY IDENTIFIED AND ANALYZED.

A. Historical and Architectural Resources/Cultural Resources.

11 1. **Setting has not been adequately described**. Among the most serious inadequacies in the DEIR's description of the environmental setting is the failure to include all of the information contained in the study titled *Kearny Street/Columbus Avenue Project, Section 106, NHPA: Supporting Information*, by Page & Turnbull, Inc., dated December 20, 1996 (the "Page and Turnbull Report"). This study, a copy of which is enclosed with this letter as Exhibit J, was completed following the City's certification of its final SEIR. Why hasn't the Page and Turnbull Report been included in its entirety as an appendix to the College DEIR or incorporated by reference?

12 The DEIR fails to set forth and clearly define the location of the project site at the terminus of two historic districts: 1) Jackson Square, a National Register Historic District and the City's first locally designated historic district, and 2) Chinatown Historic District which has been determined eligible for listing on the National Register of Historic Places and is now listed on the State Register of Historic Resources. 13 In this regard, information contained in the studies on *Chinatown Historic District* prepared by Philip Choy for the Landmarks Preservation Advisory Board (January 1991) and on *Jackson Square (Study)* prepared by the San Francisco Department of City Planning (January 1971) should be considered and included in the EIR. The information contained in *North Beach San Francisco: An Architectural, Historical and Cultural Survey*, by Anne Bloomfield, Daniel Warner and Nancy Olmsted, 1982 should also be considered and included in describing the project's historic setting. Why haven't these been included in the DEIR?

14 In addition, the DEIR fails to analyze whether, as we believe, there is a significant concentration of historic resources in the Columbus Avenue/North Beach Corridor which possess sufficient architectural or historic significance to comprise a potential third National Register Historic District. Further study and evaluation of the properties in this corridor should be conducted as a part of the College's environmental review to determine the full impact of the demolition and replacement of two low-scale historically significant buildings at the entrance to North Beach on Columbus Avenue. Will this evaluation be accomplished as part

14 of this EIR? Will a professional architectural historian be retained to perform this study?

15 Another serious inadequacy in the DEIR's description of the environmental setting is its failure to accurately list and describe the individually significant buildings in the area, including each of the contributory buildings within the above-mentioned designated or potentially eligible historic districts. For example, the information contained in the description of the environmental setting on page 40 as to the significant buildings in Jackson Square appears incorrect. Please examine the *Jackson Square (Study)* referenced above to correctly list the significant buildings. Likewise, please examine each of the other studies noted above in order to accurately identify the significant historical and architectural resources.

16 The historical and architectural significance of the John G. Ils Hotel (commonly known as the Fong Building) as a contributory building to a potential National Register Historic District has not been accurately stated in the DEIR. In fact, the information set forth as to the John G. Ils Hotel/Fong Building is incomplete and misleading. Please see the documentation contained in the Page & Turnbull Report which should assist in this regard. Why has an architectural historian not been engaged by the EIR consultant to properly analyze the available information and to professionally assess the potential for a third National Register eligible historic district along the Columbus Avenue/North Beach Corridor? This appears to be a serious inadequacy in the DEIR.

17 A further inadequacy in the DEIR's description of the environmental setting is the failure to include any photographs of the Colombo Building, the John G. Ils Hotel/Fong Building or any other of the impacted historic or architecturally significant resources in the area. This is required to aid the public and the decision-makers in analyzing the impacts.

18 The environmental setting of the proposed project as part of the historic "gateway" to North Beach should described. The following should be included and considered:

> "The critical relationship of the effected block and its surroundings is apparent in the relationship between the Colombo Building and the Fugazi Bank/Old Transamerica Building on the opposing corner. The matching pair introduce the beginning of Columbus Avenue from the downtown area by demonstrating the unusual axis of the avenue in the design of each gore corner. The rounded corner signals transition and a change in axis while the scale of the buildings represents that of the area and the cohesion of historic districts. The cohesion of the Colombo Building to the Old Transamerica Building seems

> to bind it to the Jackson Square Historic District." (Page and Turnbull Report, pages 53-54).

18 Although less significant than the Colombo Building, the Fong Building's frontage on Columbus Avenue gives it and adjacent buildings "prominence at the entrance of such an integral passage from downtown and toward the North Beach area" (Page and Turnbull Report, page 56). Will this kind of information be described and considered?

19 Why is there no Cultural Resource section under Environmental Setting and Impacts? Archaeological investigations were never conducted for the Fong Building site. Will this be done by the College as a part of this EIR process? The results of such study should be included in this EIR. Since mitigation measures are included in the DEIR in response to the "likelihood" that archaeological resources will be encountered, a summary of all of the findings, including those from the previous investigations conducted for the Pan Magna sites, must be included in the description of the environmental setting. You state in your initial study that there are potentially significant archaeological resource impacts that will be mitigated. How can the public and decision-makers determine if the mitigation measures are adequate if there is no description in the EIR of the potentially significant impacts?

20 2. Impacts to Historic Properties and Resources have not been adequately addressed or are improperly analyzed. The statement made in the DEIR that the "[d]emolition of the Colombo Building and the Fong Building would not significantly affect the architectural resources or integrity of those districts [the Chinatown Historic District or the Jackson Square Historic District]" (DEIR, page 5) is clearly incorrect. As evidenced by the following statements in the Page and Turnbull Report analyzing the demolition and replacement of only the Colombo building, the proposed project would significantly affect the architectural resources and integrity of the Jackson Square Historic District:

> "Jackson Square is a designated landmark and National Register of Historic Places district, in which the oldest commercial buildings exist from the 1850's and 1860's. The District stands as an example of pre-1906 earthquake architecture dating from the days of the Gold Rush. The buildings maintain a modest scale, mostly under forty feet and their detailing, fenestration, an materials have a continuity that unifies the district. The Classical detailing of the buildings is characteristic of mid-nineteenth century storefronts. The relationship of Jackson Square to the Colombo Building block is bound by the spire of Columbus Avenue, on which both face and contribute to. It is obvious

> that the buildings in the area have taken their lead from Jackson Square just as the Colombo Building took its direction in design from the Old Transamerica Building" (pages 56-57).
>
> "Because the Colombo Building and the Old Transamerica Building answer each other so clearly, and are two and three stories in height, the introduction of a ten-story bulk on Site B destroys implied balance. Such a bulk, placed over the location of the Colombo Building plan, will make the present "gateway" to Columbus Avenue lopsided" (pages 118-119).

The proposed campus project would have greater impacts on historic and architectural resources than the project which was analyzed in the 1996 SEIR. The College's proposed demolition of both the Colombo Building and the Fong Building and their replacement with a seven- and eight-story building, with a height of up to 119 feet spanning Ils Lane, will have a much greater impact on the historic resources of the area than the project analyzed in the City's 1996 SEIR and the one examined in the Page and Turnbull Report. In fact, reliance by the College in its DEIR upon the prior environmental evaluation contained in the City's 1996 SEIR for the PUD project is inadequate since the impacts to the historic resources of the currently proposed project are greater than those of the project previously analyzed. Even though the actual design is unknown at this time, we know that the proposed campus structure would clearly not be of the same mass and scale as that of the Fugazi/Old Transamerica Building immediately opposite in Jackson Square. Not only will the proposed project destroy the existing cohesion of the Colombo Building to the Old Transamerica which binds it to the Jackson Square Historic District, but it will completely destroy the historic "gateway" to North Beach. Will this greater impact of the currently proposed be described and analyzed in the College's EIR? 20

The DEIR states that "detailed architectural design would be developed at the time of proposed construction, which would not be for several years." (DEIR, page 2). Since no architectural design is available at this time, it is not possible to fully analyze the affect of the proposed campus structure on the surrounding historic districts and individually significant and contributory structures. Will a supplemental EIR be required at the time a design is proposed? Or will strict design guidelines be developed for environmental review as part of this EIR? Reference to a vague "objective" as to the final design to be developed sometime in the future (DEIR, page 18) is clearly inadequate for purposes of this CEQA analysis. 21

B. **Land Use and Zoning.**

22 1. **Setting has not been adequately described.** The location of the project site at the terminus of two historic districts and a potential historic district at the "gateway" to North Beach from the financial district should be described in greater detail. In addition, significant architectural and historic buildings should be described. See comments and questions which are incorporated here by reference relating to setting in the Historical and Architectural Resources section, above.

23 The actual heights of all existing buildings in the area should be included.

24 The actual number of residential units and occupants of buildings in the nearby area should be set forth.

25 2. **Impacts to Land Use and Zoning are not adequately considered and analyzed.** Although there are numerous other inadequacies in this section of the DEIR, we mention the following by way of example:

We strongly disagree with the finding contained in the DEIR that "because land uses in the vicinity of the site include a mix of retail, office and residential activities, the proposed educational use on the project site would not be incompatible with, or substantially alter, the mixed-use character of the site and vicinity, and thus, would not have a significant land use impact." (DEIR, page 2). This finding simply cannot be justified by the facts and is incorrect. It is obvious that building a college campus with approximately 158,000 gross square feet up to 119 feet high to serve 6,630 students and 150 faculty in place of a three-story residential building housing 21 low income families (Fong Building) and a two-story retail and office building (Colombo Building) would *substantially* change the intensity and nature of the land uses on the project site and would *substantially* alter the character of the site and vicinity. No other finding can logically be made. Will the DEIR be amended to change the above-quoted finding to state that the proposed educational use on the project site would be incompatible with and substantially alter the character of the site and vicinity and would have a significant land use impact?

26 The DEIR states at page 47: "The project would change the population *somewhat*" in that "there would no longer be 50 permanent residents at the site." This statement is simply wrong. A change from 50 residents to 6,630 students and 150 faculty members is a substantial and significant change in the number of people in the area. Will this statement be corrected?

Further, because the project site is located at the terminus of two recognized historic districts: Jackson Square and Chinatown Historic Districts, and a third potentially eligible historic district along the Columbus Avenue/North Beach corridor, and would demolish the National Register eligible Colombo Building at the gateway to North Beach, the low-scale historic character of the site and vicinity would be substantially and detrimentally altered by a building of the height and bulk proposed. Will these facts be considered? 27

The discussion of the design of the proposed campus (DEIR, page 49) is meaningless since there is no design evaluated in the DEIR. As stated above, since no architectural design is available at this time, it is not possible to analyze as a part of this EIR the affect of the proposed campus structure on the older, low rise neighborhood commercial character of Chinatown, Jackson Square and North Beach, and there is simply nothing in the EIR to support the finding contained in the DEIR that "the project would be substantially consistent with the design goals presented in the *Urban Design Element* of the *San Francisco General Plan*" (DEIR, page 49). In fact, the only evidence we have as to what the building design will be is the picture in Figure 16. Based on this photograph, the opposite would be true -- the finding should be change to state that the project would be inconsistent with the design goals of the *Urban Design Element*. 28

We agree that the loss of 21 housing units from the demolition of the Fong Building would constitute a significant environmental impact and is in violation of the San Francisco Planning Code. However, the DEIR fails to state and discuss the fact that demolition without replacement housing also violates the *Residence Element* of the *San Francisco General Plan*, Proposition M and numerous other written housing policies adopted by the City, as well as provisions of state law which apply to the proposed campus project. Will the DEIR be amended to discuss and consider each of these laws? 29

The project description contained in the DEIR indicates that the campus project would be built over Ils Lane, but does not accurately describe the fact that Ils Lane is a publicly owned right-of-way. In fact, the College DEIR conflicts with the City's 1996 SEIR and with the City's approval of the PUD as to the use of Ils Lane. The College EIR should address these inconsistencies and discuss the legal requirements and impacts of using the public right-of-way in the manner proposed by the College. Will this be done? 30

Each of the City Planning Code requirements that would apply to the proposed campus project, and each of the detailed requirements and conditions of the approved PUD and recorded Special Restrictions from which the College intends, according to the DEIR, to exempt itself, should be enumerated and described in much 31

31 greater detail than provided in the DEIR to allow the public and decision makers to fully understand the significance of the College's intention to exempt itself and the resulting impact on e Community.

32 We have the following additional comments as to the project's consistency with the San *Francisco General Plan*:

- What is meant by the use of the words on page 49 of the DEIR "[t]he project would not ***respond*** to Policy 4, Objective 2..." Please be direct in the use of the English language. State the facts: The proposed project "would be inconsistent with" (or "does not comply with" or "violates") Policy 4, Objective 2 of the *Urban Design Element* because the Colombo Building would be demolished.

33
- The DEIR incorrectly states that "the project would be substantially consistent with the design goals presented in the *Urban Design Element* of the *San Francisco General Plan.*" There is no justification for this statement. Clearly the proposed project does not meet virtually any of the Objectives or Policies of the *Urban Design Element*. Objective 2 encourages the "conservation of resources which provide a sense of...continuity with the past and freedom from overcrowding. How does this project conform to Policy 4 which states, "preserve notable landmarks and areas of historic, architectural or aesthetic value and promote the preservation of other buildings...that provide continuity with past development"? How does the project "Respect the character of older developments nearby (Objective 2, Policy 6)? Why doesn't the DEIR include a shadow study which shows the impacts to the Jackson Square Historic District and other individual properties? How does the project conform to Objective 2, Policy 7 which says that outstanding and unique areas should be recognized and protected (such as the Jackson Square Historic District and the "gateway" to North Beach)? Given the fact that the project will be built over Ils Lane, how does it meet the criteria set forth in Objective 2, Policy 8? How does the proposed project conform to any of the policies set forth under Objective 3 such as Policy 2 which seeks to "Avoid extreme contrasts...which will cause new buildings to stand out in excess of their public importance"? Or Objective 3, Policy 8 which seeks to "Discourage... development of large properties? Objective 1, Policy 7 emphasizes the recognition of "the natural boundaries of districts" For over thirty years Washington Street has represented the boundary between the financial district and the human scale environment of the residential, historic neighborhoods. How does violating this boundary meet these policies of the *Urban Design Element*?

34
- Nor does the project appear to conform to the *Residence Element* of the *San Francisco General Plan*. For example, Objective 12, Policy 3 tries to "Minimize disruption caused by expansion of institutions into residential areas." Here we are destroying a

residential building occupied by 21 low income families. Policy 6 suggests that we "Modify proposed developments which have substantial adverse environmental impacts or otherwise conflict with the Master Plan." Objective 14, Policy 1, attempts to "Minimize relocation hardship and displacement caused by the public or private demolition...of housing." Policy 3 requires that we "Provide relocation services where publicly funded ...actions cause displacement. How does the College intend to conform to any of these General Plan policies or objectives? 34

- The DEIR relies on the *Community Facilities Element* of the *General Plan* (Objective 8, Policy 1) which according to the DEIR (DEIR, page 49) "encourages fulfillment of the District's needs". The DEIR neglects to mention that Objective 8, Policy 1 also states that the College should "Locate such facilities according to the Public School Facilities Plan. As the General Plan reveals, the Facilities Plan shows no such facility for Chinatown/North Beach on its plan. Enclosed as Exhibit K is map no. 6 from the *Community Facilities Element* of the *General Plan.* If the College is attempting to use the DEIR to "balance" the General Plan's prohibition on the demolition of historic buildings and residential structures such as the Colombo and Fong Buildings it hasn't succeeded. 35

- With regard to resolving conflicts among the various objectives and policies of the *San Francisco General Plan*, the following inaccurate statement is contained in the DEIR at page 49:

> "The *San Francisco General Plan* is a policy-based document; it is expected that there will be conflicts among the various objectives and policies. Decision makers use the General Plan by balancing the various objectives and policies that may be relevant to the project under consideration. For the Chinatown/North Beach Campus project, the District Board of Trustees and other decision makers would balance consideration of policies regarding the loss of architectural resources and housing units with policies supporting provision of educational facilities and services that would be met by the project"

The DEIR fails to disclose and consider the preamble to the City's Master Plan which provides that:

> "The Plan is intended to be an integrated, internally consistent and compatible statement of objectives and policies and its objectives and policies are to be construed in a manner which achieves that intent." 36

As to resolving conflicts between the various objectives and policies, the City's Master Plan is clear. It provides that the 37

37 following Priority Policies, established by Proposition M, adopted by the voters on November 4, 1986, shall be the basis upon which inconsistencies in the Master Plan are resolved:

> "1. That existing neighborhood-serving retail uses be preserved and enhanced and future opportunities for resident employment in and ownership of such businesses enhanced;
>
> 2. That existing housing and neighborhood character be conserved and protected in order to preserve the cultural and economic diversity of our neighborhoods;
>
> 3. That the City's supply of affordable housing be preserved and enhanced;
>
> 4. That commuter traffic not impede Muni transit service or overburden our streets;
>
> 5. That a diverse economic base be maintained by protecting our industrial and service sectors from displacement due to commercial office development, and that future opportunities for resident employment and ownership in these sectors be enhanced;
>
> 6. That the City achieve the greatest possible preparedness to protect against injury and the loss of life in an earthquake;
>
> 7. That landmarks and historic buildings be preserved; and
>
> 8. That our parks and open space and their access to sunlight and vistas be protected from development."

Clearly with regard to the proposed campus project, application of the Priority Policies would resolve conflicts among the various objectives and policies of the City's Master Plan in favor of preserving the existing affordable housing in the Fong Building and preserving the historic Colombo Building over the construction of the campus project. The Priority Policies must be set forth in the College EIR and applied. Will the above-quoted statement in the DEIR at page 49 be restated or otherwise corrected?

C. Aesthetics.

38 1. **Setting has not been adequately described.** Information should be added from the Page and Turnbull Report describing the setting of the proposed project as part of the historic "gateway" to North Beach, the relationship between the Colombo Building and the Fugazi Bank/Old Transamerica Building on the opposing corner and how the scale of the buildings represents that of the area and the cohesion of historic districts. The

description of the setting should be revised to include information as to the existing cohesion between the Colombo Building and Jackson Square Historic District. "The cohesion of the Colombo Building to the Old Transamerica Building seems to bind it to the Jackson Square Historic District." (Page and Turnbull Report, pages 53-54).

And as to the Fong Building, a description should be included from the Page and Turnbull Report of how the Fong Building's frontage on Columbus Avenue gives it and adjacent buildings "prominence at the entrance of such an integral passage from downtown and toward the North Beach area" (Page and Turnbull Report, page 56).

Please refer to our comments on the setting set forth above in the Historical and Architectural Resources section which we incorporate here by this reference. 38

Please add here a description of the heights of all of the buildings in the area, perhaps on a map showing the historic districts and significant buildings. 39

2. **Impacts to Aesthetics have not been properly set forth**. The statement on page 57 of the DEIR that the project would not substantially adversely affect the visual character of the environs of the site is simply inaccurate. Public views and vistas would be significantly and adversely affected by the project. The DEIR does not properly analyze the views of the project site. The view from the Transamerica Pyramid looking north up Columbus Avenue toward North Beach and Telegraph Hill seems to have been overlooked and is not analyzed in the DEIR. Photographs of this "gateway" to North Beach are missing from the DEIR. This information and analysis must be included. The size, bulk and mass of proposed replacement structure for the Colombo building, and the indications of a proposed design on pages 58-61 will be dramatically out of character and scale with the Old Transamerica Building and the other buildings on Columbus Ave. and will thereby significantly and adversely impact the public vista from this entrance into North Beach. 40 The DEIR's statements to the effect that "the project would be less prominent than the *approved*, 15-story St. Mary's Project" is not a proper comparison or analysis. As pointed out above, the 15-story St. Mary's Project (Site A) is in fact a part of the PUD project of which the proposed campus project (Site B) is a part. Instead of using the proposed 15-story tower to some how justify another visual intrusion into this area, the EIR must analyze the cumulative impacts of the project as a whole (Sites A and B) on the visual character of the area. Will each of these inaccurate statements and deficiencies be corrected in the DEIR? 41

D. **Impacts to Transportation have not been adequately considered**. The information contained in the DEIR 42 is grossly inadequate, misleading and incorrect. Please address each of the following comments and questions:

42 The "Analysis Methodology" is predicated on using information drawn from data at only one of the ten existing campus sites (gathered at the Filbert Campus based on one survey for a two hour period on February 25, 1998). Without information about the peak usage at the other nine campus locations, this information is not particularly useful and presents a weak foundation for the entire transportation analysis that follows. Why wasn't data from the other existing locations been collected in order to make the transportation impact section of the DEIR more meaningful and reliable?

43 The survey period was supposed to establish an estimate of the percentage of daily person-trips that occur during the PM peak period. Why was 4:00 to 6:00 P.M. chosen? Based on class room schedules is this 2-hour period the most heavily used period during which to conduct the survey? Why wasn't there a morning peak period surveyed as well? If the estimates in the indicate DEIR that only 9% of the daily person trips occur in this PM "peak", when do the other 91% of the total daily tips occur? The DEIR states that almost half of all classes are offered during morning hours between 8 A.M. and 12 noon (DEIR, page 20). Why wasn't this period used to determine the peak period usage which in turn would most likely generate significantly larger parking demand numbers?

44 In addition, there is no analysis as to how the programmatic dynamics at one centralized campus vs. 9 satellite locations might be expected to change peak period usage and the daily person-trip numbers. Why doesn't the DEIR include any analysis of how a centralized campus with a concentration of programs and facilities might change expected person-trips? Also, there should be some consideration of the fact that students may leave the campus between classes and return to the campus (potentially generating twice as many person-trips per day). The same question needs to be asked regarding expected daily use by the student body? Would only 70% of the total student enrollment attend classes on a typical weekday as is the current practice, especially in light of projected extended programs and laboratories slated for this consolidated campus? A ten percent (10%) increase in daily attendance would, based on the figures in the DEIR, result in an additional 1,326 student person-trips.

Based on the information in Beverly Prior's Needs Assessment Study (which found that 53% of the students desire additional afternoon and evening classes) an increase of the 9% PM "peak" usage numbers discussed above should be anticipated to more than double. A 20% afternoon peak usage therefore is realistic and should be anticipated. This 11% increase would produce 1,021 student person-trips. Why doesn't the DEIR use the information from the

Needs Assessment Study to predict this type of peak period usage at the new campus? The LOS rating should be analyzed with this likely additional person-trip generation. 44

The DEIR acknowledges that there will "be a shortfall of about 105 parking spaces" (DEIR, page 83) but then goes on to say that this will not have "significant physical impacts on the environment" and attempts to justify this statement by trumpeting the City's Transit First policy. What are the air quality impacts of 105 cars circling around. The City recently ignored its Transit First policy in approving a new parking garage in North Beach and cited the extreme parking shortage in the Chinatown/North Beach area to justify the project. How can you seriously justify the statement "Parking shortfalls relative to demand are...not considered significant environmental impacts in the urban context of San Francisco"? This is tantamount to not complying with CEQA in good faith. Clearly, this is a significant impact of the project. If any other project came into these heavily congested neighborhoods and were going to have an acknowledged 100 plus automobile parking shortfall, it would be considered a *major* impact which would need to be mitigated. What mitigation measures will the College propose? At a minimum more quantifiable justification is needed. What will the impacts to LOS levels and air quality be? 45

The parking numbers in the DEIR are inconsistent with the numbers set forth in Beverly Prior Needs Assessment Study. Why? Based on the numbers in Ms. Prior's study the project would require over 300 parking spaces (based on "parking provisions for an urban campus of "one auto per 330 assignable square feet for the student population"). Isn't Ms. Prior's formula more reliable than the numbers set forth in the "Analysis Methodology" section of the DEIR which are based on scant information from one of the ten existing campuses? Isn't it more likely that there is an actual shortfall of approximately 200 spaces? How is this negative impact going to be mitigated? Shouldn't the DEIR consider a potential cumulative impact of a future parking structure? 46

Based on the questionable numbers set forth in the DEIR it is anticipated that at weekday peak periods there will be 325 "Walk/Bicycle Person-Trips" (Table 3, page 81). How many of these are expected to ride bicycles as opposed to walk? Where will these bicycles be accommodated? If they are accommodated with bicycle racks on the side walk what will the impacts to pedestrian circulation be? If they are accommodated in the garage, how many additional automobile parking spaces are likely to be lost? 47

We are extremely concerned about the startling differences in information presented in the DEIR and in the 1996 SEIR with regard to Transit Impact analysis. The 1996 SEIR states that: "Most MUNI lines, whose maximum load points occur near the project site, currently operate near or above peak load factor standards in peak directions. Therefore, they have little excess capacity to absorb 48

48 any new demand, including the additional transit trips that would be generated by the proposed project." (SEIR, page 94) It is a well known and documented fact that MUNI capacity has further diminished in the last two years since the 1996 SEIR was adopted. The DEIR states: "Capacity utilization for all lines is 70%. Thus, the lines have capacity to accommodate additional passengers". (DEIR, page 85). What is the source of this statistic? This inconsistency causes us to question the reliability of the information used in all other areas of the Transportation Analysis.

49 Other information is incorrect or misleading. For example the Parking section contains a statement that: "On-street parking in the vicinity of the proposed project is mostly comprised of one-hour and two-hour parking meters..." (DEIR, page 75). Why isn't there any mention of the half-hour parking meters which lie immediately south of the project site on Montgomery Street in the financial district?

50 Why does the DEIR largely ignore the existence of the heavily congested financial district? For instance, because of the proximity to the Transamerica Pyramid, which creates significant pedestrian traffic during various hours during the day, the sidewalks become very congested at times. The "Pedestrian Conditions" section of the DEIR states, "Based on the transportation study, all study crosswalks currently operate at LOS B or better conditions..." Exactly what "transportation study" is this referring to? On what basis was this conclusion reached?

51 **E. Environmental impacts of relocating nine of ten campus site locations into one central location has not been analyzed.** The project is described as involving the "relocation of all satellite site locations of the existing Chinatown/North Beach Campus, except for the Marina Middle School site, to the new facility." (DEIR, page A.1). The DEIR fails to consider the environmental impacts of centralizing these nine campus locations. What are the environmental impacts of consolidating nine of the existing ten sites into one location? For example, it would appear that the impacts on traffic, parking, bicycle access and safety are much greater if the 6,630 students and 150 faculty members are concentrated in one location as compared to being dispersed throughout the community in the current 9 locations? As another example, the DEIR states that approximately 36% of the students walk to the existing campus locations. How many will be required to find another means of transportation once the campus locations have been consolidated? How will bicycle access and bicycle safety be impacted? How does parking availability compare between the nine dispersed locations and the one centralized location? All individual and cumulative environmental impacts of consolidating the nine campus site locations must be analyzed and considered.

F. The DEIR fails to address other potentially significant environmental impacts stemming from implementation of the proposed campus project.

The Initial Study indicates that wind tunnel testing would not be necessary. However, given the massing and proposed orientation of the proposed project, it appears obvious that it will create a wind tunnel effect. The initial study justifies not studying wind effects because of the proposed 15-story low-income tower on Site A. It is possible however that this structure may not be built and therefore the wind effects of the College project must be analyzed in this EIR. The same holds true for shadow studies. Shadow studies must be included in this EIR. 52

V. MITIGATION MEASURES ARE INADEQUATE.

A. Loss of Affordable Housing Units. We agree with the determination contained in the DEIR (Pages 50 & 126) that the loss of 21 housing units from the demolition of the Fong Building would constitute a significant adverse environmental impact from the project and is in violation of the San Francisco Planning Code and General Plan. The mitigation measure contained in the DEIR (Page 110) for the loss of this housing resource, namely City College's proposed participation in the Treasure Island Consortium to provide housing for students and faculty, not only does not address the significant impact caused by the demolition of 21 affordable housing units, it has absolutely nothing to do with the elimination of 21 housing units in Chinatown. In fact, it is our understanding that City College involvement in this has been independent of the College's intentions to acquire and demolish the Fong Building. 53 Nonetheless, if the College is attempting to use housing on Treasure Island as a mitigation measure, CEQA requires the EIR to consider the individual and cumulative impacts of the Treasure Island project. What are the transportation impacts of relying on housing on Treasure Island? What percentage of students who will be using the proposed Chinatown/North Beach Campus expected to utilize housing on Treasure Island? How many automobile trips are likely to be generated from the proposed Chinatown/North Beach Campus to and from the housing at Treasure Island? It appears that using housing on Treasure Island as mitigation is tantamount to a growth inducing impact. How will this be analyzed and mitigated? What are the cumulative impacts of the Chinatown/North Beach Campus in light of the College's proposed project on Treasure Island given that the College has connected the two projects? 54

B. Demolition of Historic Colombo Building. We agree with the determination contained in the DEIR (pages 67-8 & 126) that the demolition of the Colombo Building, a structure determined to be eligible for listing in the National Register of Historic Places, would constitute a significant adverse 55

55 environmental impact from the project. Where, as here, significant impacts to historic resources will occur, Section 15126(c) of the CEQA Guidelines requires an EIR to identify and examine mitigation measures which would minimize the significant impacts. The only mitigation measure contained in the DEIR for the demolition of the Colombo Building is historic documentation to be prepared by Pan Magna Group "as a condition of sale"[2] (DEIR, pages 111-112). Documentation of the historical features does not reasonably begin to alleviate the impacts of its destruction. Once demolished, the Colombo building cannot be replaced by a report. Nor can a report mitigate the significant impact that the demolition of the Colombo and Fong Buildings (and their replacement with the proposed new construction) will have on the Jackson Square Historic District, the National Register-eligible Chinatown Historic District, the potentially eligible Columbus Avenue/North Beach Corridor Historic District, and on the historic and aesthetically significant "gateway" to North Beach. Does the College intend to propose any other mitigation measures?

56 C. __Demolition of the John G. Ils Hotel/Fong Building__ No mitigation measures have been identified or examined to minimize the significant impact of demolishing the architecturally significant John G. Ils Hotel/Fong Building. How will the EIR be modified to correct this significant oversight? Will the EIR suggest additional mitigation measures for the Ils Hotel/Fong Building?

57 D. __Cultural Resources__. The Initial Study at A.31 and the description of the mitigation measures at page 109 of the DEIR state that "these additional mitigation would be implemented by the District [College] and ***might*** include a program of on-site monitoring of all site excavation..." "Might" should be changed to "shall". Also, include in the EIR a comparison between the mitigation measures being proposed in the DEIR and those being considered for inclusion in the federal NHPA Section 106 Agreement. As between these, the most stringent mitigation measure should be included in the EIR and required.

58 **VI. __ALTERNATIVES CONTAINED IN THE DEIR ARE INACCURATE AND INADEQUATE__.** Section 15126(d)(1) of the CEQA Guidelines provides that:

> "Because an EIR must identify ways to mitigate or avoid the significant effects that a project may have on the environment (Public Resources Code Section 21002.1), the

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[2] We note that the Agreement of Purchase and Sale dated May 6, 1997, between Pan Magna Group and San Francisco Community College District, as amended, does not in any way clearly set forth that it is Pan Magna's obligation to conduct the documentation and recordation of the Colombo Building. Therefore, such statement in the DEIR is not accurate.

> discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, *even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly.*" [Emphasis added]

The emphasized portion of the above-quoted provision should be clearly stated in the Alternatives section of the EIR. It appears to have been left out of the DEIR and is important to inform members of the public and decision makers that project alternatives that would cost more or would not fully address the stated campus needs must nonetheless be considered under CEQA. 58

The DEIR fails to disclose and consider in its evaluation of alternatives the fact that an offer was made jointly to the College and Pan Magna Group on April 1, 1998 by Chelsea Development Company to purchase and preserve the Colombo Building. Enclosed as Exhibit L is a copy of the April 1, 1998, letter for inclusion and consideration in the environmental analysis of the alternatives to the proposed project. The analyses of the Alternatives in the DEIR assumes that if the College does not demolish the Colombo Building it will be demolished anyway in the near future to make way for the construction of the office or residential tower. Given the existence of the offer from Chelsea Development Company, this assumption must be corrected. Failure to include this information in the EIR and to consider it in reviewing alternatives would impede meaningful evaluation, analysis and comparison with the proposed project as required by CEQA. (See Section 15126(d)(3) of the CEQA Guidelines). Will these corrections be made? 59

Given the existence of this real preservation opportunity, additional alternatives to the project must be identified and examined which would include the preservation of the Colombo Building by Chelsea Development Company which could be in conjunction with the development of the campus project on the remaining project site. Will these alternatives be identified and examined? 60

As to the alternatives analyzed in the DEIR, they are so cursory, poorly reasoned and written and internally contradictory that meaningful consideration of alternatives is not possible. Various sites (such as the Broadway and Battery site) are rejected because they are "expected to be designated for housing". First, this conclusion is based on a newspaper article dated November 5, 1996 rather than actual investigation or inquiry. Second, the fact that it may be slated for housing shouldn't preclude its consideration. After all, there is existing housing on the project site which the College is proposing to demolish for its campus. So how can the analysis simply conclude that because a site may be designated for housing it therefore is precluded as an alternative. This strikes the reader as a disingenuous application of the requirement to analyze alternatives to the 61

61 project and is clearly in violation of CEQA Guidelines, Section 15126. Will the Alternatives analysis be revised to correct these shortcomings?

62 By way of another example as to the total inadequacy of the Alternatives section, Lots 6 and 7 on Washington Street are considered to be an "unacceptable" alternative because construction on these parcels would cause significant shadows on Portsmouth Square. How does the EIR preparer determine that shadows on Portsmouth Square are unacceptable compared to demolishing historic resources and low-income housing?

VII. CUMULATIVE IMPACTS NOT CONSIDERED IN THE DEIR.

63 CEQA requires that cumulative impacts be discussed in an EIR where, as in the case of the campus project, they are "cumulatively considerable". For a discussion of cumulative impacts in an EIR to be adequate, CEQA requires a list of past, present and reasonably anticipated future projects producing related or cumulative impacts, including those projects outside the control of the agency, a summary of the expected environmental effects, and a reasonable analysis of the cumulative impacts of the relevant projects. (Section 15130, CEQA Guidelines)

Although the DEIR states that the low income housing project on Site A will be considered, where appropriate, in the cumulative impact analysis in this EIR (DEIR, page 35-36) it is not. We also note that in the College's Initial Study at page A.24, the College made a finding that the cumulative impacts of the project would be potentially significant. Why is there no cumulative impacts analysis in the DEIR? Why is the Site A development not considered at all in this DEIR? Clearly it is a reasonably anticipated future project producing related or cumulative impacts. Other than the development on Site A, what other projects are contemplated in the financial district or nearby? The DEIR is substantially deficient without a Cumulative Impacts analysis. Will this be added?

VIII. DOCUMENTS REFERENCED IN THE DEIR WERE NOT ADEQUATELY SUMMARIZED IN THE DEIR AND WERE NOT READILY AVAILABLE FOR PUBLIC REVIEW.

64 The College DEIR relies to a very large degree on other documents which are not included in the DEIR. The Appendix B for historic resources contains only one page despite the fact that the impact to historic resources has been identified in the DEIR as a significant environmental impact of the proposed project. CEQA allows for the use of incorporation by reference only if it is used in a manner consistent with the public involvement and full disclosure functions of CEQA. As set forth in the following examples, we believe that the use of incorporation by reference in

this DEIR is inconsistent with the requisite public involvement and full disclosure. 64

Section 150150(b) of the CEQA Guidelines requires that "where part of another document is incorporated by reference, such other documents shall be made available to the public for inspection at a public place or public building. The EIR...shall state where the incorporated document will be available for inspection." At page v of the Introduction, the DEIR states that "[d]ocuments referenced in this EIR are available for review at the address below, during normal weekday business hours." The address given is:

Peter A. Goldstein
Chief Operating Officer
City College of San Francisco
33 Gough Street
San Francisco, California 94103

In spite of these legal requirements and the statement contained in the DEIR, we are aware of incidents where members of Friends of the Colombo Building, as well as other members of the public have requested such documents at the 33 Gough Street location and were told that they had to "put their requests in writing" or "we'll have to get that document from Pan Magna" and/or had to convince the personnel at this address that such documents really had to be made available for review pursuant to the requirements of CEQA. In conflict with the requirements of CEQA, the referenced documents were not readily available to the public and in some cases did not appear to be available at all. How will this inconsistency with the full disclosure requirements of CEQA be resolved? 65

Section 150150(f) of the CEQA Guidelines provides that "[i]ncorporation by reference is most appropriate for including long, descriptive, or technical materials that provide general background *but does not contribute directly to the analysis of the problem at hand.*" [emphasis added] Here, the DEIR improperly incorporates portions of the City's 1987 EIR and 1996 SEIR which clearly contribute directly to one of the project's two most significant environmental impacts identified in the DEIR -- the demolition of the Colombo Building. These incorporated portions are not the type of long technical information contemplated by CEQA. Further, the incorporated information is not adequately summarized in the DEIR to give the public sufficient information and will not suffice for consideration by the decision makers. All of the referenced information should have been included in the DEIR so that significant environmental impacts resulting from the demolition of the Colombo Building can be properly considered and analyzed by the public during the review period and by the decision makers. How will this inconsistency with the requirements of CEQA be resolved? 66

IX. COPIES OF THE DEIR WERE NOT AVAILABLE TO MEMBERS OF THE PUBLIC REQUESTING THEM; INADEQUATE TIME FOR REVIEW AND INPUT BY THE SAN FRANCISCO LANDMARKS ADVISORY BOARD

67 "Public participation is an essential part of the CEQA process." (Section 15201 of the CEQA Guidelines). The courts have emphasized that the public holds a "privileged position" in the CEQA process "based on a belief that citizens can make important contributions to environmental protection and on notions of democratic decision making." CEQA requires that "[t]he Lead Agency shall provide adequate time for other public agencies and members of the public to review and comment on a draft EIR that it has prepared." (Section 15203 of the CEQA Guidelines) Although the normal review period is 45 days for EIRs submitted to the State Clearinghouse, the State Clearinghouse may set shorter review periods "in extraordinary circumstances" when requested by the Lead Agency. (Section 15205(d) of the CEQA Guidelines). Here the College requested and was granted a 30 day review period. What was the basis for the College's claim that extraordinary circumstances existed?

68 We are aware of several individual members of the public who requested a copy of the EIR but did not receive one prior to the time comments were due. None of these individuals received a call or letter from the College advising them that they would not be receiving a copy or letting them know where they might obtain a review copy. As a result, some members of the public were unable to comment by the end of the shortened review period.

69 Even though the City was (incorrectly, we believe, as pointed out above) not included in the EIR process as a "Responsible Agency," CEQA requires the Lead Agency to provide adequate time for the City, as a public agency, to review and comment on the DEIR. As you are aware, the San Francisco Landmarks Preservation Advisory Board (Landmarks Board) did not have an opportunity to review and comment on the DEIR prior to the end of the shortened review period. Although consideration of the DEIR was scheduled for a public hearing at the Landmarks Board meeting of May 20, 1998, the item was canceled at the last minute due to a lack of a quorum. Consequently, the Landmarks Board, the City's only public body with the special expertise with which to review the proposed project's impacts to historic resources (including the City's Jackson Square Historic District) has effectively been denied the opportunity to comment on the DEIR. Will the College extend its comment period to allow adequate time for the Landmarks Preservation Advisory Board to consider the DEIR at a public hearing and provide comments? In light of the fact that one of the two significant adverse environmental impacts identified in the DEIR is the demolition of a National Register eligible building, this lack of review by the Landmarks Board is a serious deficiency in the EIR process which should justify the extension

of the review period to allow the Landmarks Board to hold a public hearing and provide comments. ↑69

We look forward to seeing your response to our comments and questions.

Sincerely,

FRIENDS OF THE COLOMBO BUILDING

Aaron Peskin

By: Aaron Peskin

COMMITTEE TO STOP DOWNTOWN SPRAWL

Arthur Chang

By: Arthur Chang

Enclosures

cc: Daniel Reidy, President, Landmarks Preservation Advisory Board
David Bahlman, The Foundation for San Francisco's Architectural Heritage
Niel Hart, Planner, Dept. of City Planning
Cherilyn Widell, State Historic Preservation Officer
Robert Mills Esq., U.S. Department of Housing and Urban Development
Lee Keatinge, Esq., Advisory Council On Historic Preservation
Susan Brandt-Hawley, Esq.

Letter 9: Aaron Peskin, Friends of the Colombo Building, and Arthur Chang, Committee to Stop Downtown Sprawl

Response 9-1

Under CEQA, a project is an activity directly undertaken by a public agency (Pub.Res.Code §21065; 14 Cal.Code.Regs. §15378). As described by the DEIR, beginning on p. 16, the activity which the District proposes to undertake is the acquisition of a site for the possible future construction of a college facility. The District is complying with the requirements of CEQA in preparing an EIR on the project it proposes to carry out. The District would likely consider whether to apply for City approvals for construction of the college building (which might include seeking an amendment to the PUD) or, in the alternative, exempt itself from local zoning regulations, only if and when it obtained funding for construction and decided to proceed with the college construction project. Any application to the City for an amended PUD would be premature at this point. If the District seeks City approvals for construction of the college building in the future, or decides to exercise its statutory right to exemption from local zoning ordinances pursuant to Government Code section 53094, an assessment would be made at that time whether further environmental review under CEQA would be required.

Response 9-2

The comment that the PUD requirements are more specific than the requirements of the General Plan and Planning Code is noted. In this EIR, the District analyzes the environmental impacts that would likely be caused by the proposed acquisition of the site for construction of a college facility. The analysis is assisted by a comparison of the project's impacts with environmental policies and regulations set forth in the General Plan and the City Planning Code that are generally applicable to this area of San Francisco. See, for example, DEIR pp. 42-46, 47-51.

Response 9-3

The DEIR discusses the PUD and the previous City approvals for office and residential development on Site B, Lots 4 and 5 of the site proposed for acquisition by the District, as set forth on DEIR pp. 34-36. As set forth in Response 9-1, the District's project is the acquisition of property for the possible construction of a classroom building to house the Chinatown/North Beach Campus, and the project description in the DEIR is appropriate. The City and County of San Francisco, not the District, has jurisdiction to approve an amended PUD. The DEIR acknowledges on pp. 34-35 that Site A is part of the PUD approved in 1987 and 1996. Please also refer to Response 9-1.

Response 9-4

The Section 106 process is separate from the CEQA environmental review process. The State Office of Historic Preservation received a copy of the DEIR but did not submit any comments.

The proposed project would not receive any federal funding or otherwise involve any federal agency. The acquisition of the site is intended to be funded with bonds issued by the City and County of San Francisco in response to a voter-approved educational bond measure, and the construction of any college building would be funded by the state. The draft Programmatic Agreement which is Exhibit F to this comment sets forth that "there is no federal assistance, permit, license, or approval activity associated with Site B."

HUD has drafted a Section 106 Programmatic Agreement in connection with its possible funding of low-income senior housing on Site A, and that the draft Programmatic Agreement contains provisions for recording the Colombo Building prior to demolition. Those provisions are similar to the mitigation measures contained on p. 68 of the DEIR. The District has been invited to concur in the Programmatic Agreement; however, the agreement is still in draft form. The Section 106 process is discussed in the DEIR p. 64.

Response 9-5

This comment does not appear to raise environmental issues, and thus no response is required under CEQA. However, the District notes that the acquisition of Site B by the District is not inconsistent with the PUD, which does not address ownership of the property. Please also see Response 9-1 regarding the appropriate project description for this college project.

Response 9-6

The demolition of housing is a violation of the City's zoning ordinances for which no exception or variance is available. The demolition of the Fong Building is considered a significant and unavoidable impact, despite the fact that the District would provide replacement housing, as set forth in Response 13-3.

As discussed on DEIR p. 51, the project would require certain exceptions to the zoning ordinances related to bulk, height, and other design features. The City's zoning scheme with respect to these features is not absolute, but provides a process for obtaining conditional use authorizations or exceptions for these design issues where the project is compatible with surrounding development. Exceptions would be particularly appropriate for the proposed project in light of the fact that the building would be compatible with development in the area, which is high-rise in the Financial District to the south and mixed low- and medium-rise to the north, east, and west. Please see Response 9-28 regarding the project's compatibility with General Plan policies related to design and conformity with surrounding development, and Response 9-38 regarding building heights and massing in the project area. Because the City provides an exceptions process for building mass and design issues, and because these exceptions would be appropriate for the proposed building, in light of surrounding development, the DEIR reasonably concludes that the project would not cause a significant environmental impact related to inconsistency with zoning regulations for bulk, height, and other design features.

The DEIR has appropriately described the proposed project (see Chapter II), the affected environment and environmental impacts of the project (see Chapter III), mitigation measures (see Chapter IV and Response 3-13), and alternatives to the project (see Chapter V). The DEIR on p. 51 has properly discussed the zoning ordinances for the project area related to height, bulk and other design features. Please see Response 9-1 regarding the District's project description as it relates to the PUD.

Response 9-7

An EIR/EIS is required if a project is carried out, financed, or approved in whole or in part by a federal agency as well as a state or local agency (14 Cal.Code.Regs §15220). Because neither HUD nor any other federal agency would carry out, finance, or approve any part of the District's college project, the project does not require an EIR/EIS, and Section 15222 of the CEQA Guidelines cited by the commenters does not apply to the District.

Response 9-8

CEQA Guidelines section 15051 spells out the criteria for determining a lead agency. That section states that, where two or more public agencies will be involved with a project, a public agency that carries out the project "shall be the lead agency even if the project would be located within the jurisdiction of another public agency." Here, the District is the proper lead agency because the college project would be carried out by the District, not the City, even though the project is located within the City. Clearly, the college project would not be "carried out" by the City and County of San Francisco.

Contrary to the commenters' belief, the DEIR does list the City and County of San Francisco as a responsible agency. The Notice of Preparation listed both the Planning Department and the City Attorney's Office of the City and County of San Francisco as responsible agencies. See p. A.2 of DEIR Appendix A. The DEIR also notes that the Board of Supervisors may use the EIR when it approves bond proceeds for site acquisition, again indicating the City's role as a responsible agency. See DEIR p. 36.

Response 9-9

The Master Plan for City College of San Francisco (CCSF) consists of two documents: the *CCSF Strategic Plan* and the *CCSF Facilities Master Plan*.

The *CCSF Strategic Plan* contains a vision statement, a mission statement, institutional goals and performance standards, strategies for operation, and management and implementation procedures./2/ The *CCSF Facilities Master Plan* identifies District-wide facility needs, and develops the mechanisms necessary to meet those needs./3/ The *CCSF Facilities Master Plan* notes that a site for a new building in the Chinatown/North Beach area has been approved by the College. The Master Plan also notes that the Plan itself is predicated on the idea that the Community College District will remain decentralized, retaining its campus locations in San Francisco neighborhoods. The document summarizes the existing conditions and space needs at each of the District's major facilities, and the need for a new campus building within the Chinatown/North Beach area is acknowledged. Thus the Chinatown/North Beach Campus project is consistent with the Facilities Master Plan. Within this context, the DEIR describes and lists the objectives of the Chinatown/North Beach Campus project on pp. 16-18. This is consistent with CEQA Guidelines Section 15124, regarding the content of an EIR Project Description.

The project at issue here is the proposed Chinatown/North Beach Campus, not the *CCSF Strategic Plan* or *CCSF Facilities Master Plan*. Thus a detailed analysis or summary of those plans is not relevant or appropriate.

The February 1998 update to the Facilities Master Plan has been submitted to the City Planning Department. Copies of the Master Plan documents are available for review by the public at the District's administrative offices at 33 Gough Street in San Francisco, during regular business hours.

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2. City College of San Francisco, Office of Research, Planning, Grants and Title III, *Setting a Course to the Future: The CCSF Strategic Plan,* August 11, 1997.

3. City College of San Francisco, *Facilities Master Plan*, February 20, 1998.

Response 9-10

On p. 15 of the Draft EIR, the demolition of the Colombo Building is listed as a controversial issue, as well as the loss of housing on the Fong parcel. Since the comment was submitted, the lawsuit brought by the commenters against the District and the City and County of San Francisco has been dismissed by the court without leave to amend.

Response 9-11

The August 1996 Page & Turnbull study was prepared as background information for the 1996 SEIR and is cited in endnote 3 on DEIR pp. 63 and 70. This study contains information regarding architectural and historical resources in the vicinity of the project site. The December 1996 Page & Turnbull study, expanding on the earlier report, was prepared after certification of the 1996 SEIR, as part of the Section 106 process for the Kearny Street/Columbus Avenue Project to evaluate the potential effects on historic properties. As noted on DEIR p. 64, the Section 106 process is part of the federal environmental review process resulting from proposed U.S. Department of Housing and Urban Development (HUD) funding to support the St. Mary's project on Site A. An error is noted in the third sentence of the second paragraph on DEIR p. 64 and has been corrected as follows:

> **(This project is the Site ~~B~~ A project described in the 1996 SEIR.)**

The 1996 August and December reports have in common detailed inventory reports on buildings located in the project block and a "Zone of Influence Matrix" which lists buildings in a nine-block radius around the project site which have been rated or listed in previous architectural surveys. The December 1996 report provides additional information including several additional inventory sheets; further description and information on the Colombo Building; site plans and building elevations for the then-proposed project; building photographs; a report prepared by Philip Choy for the Landmarks Preservation Advisory Board on the architectural history of Chinatown; and the 1971 City Planning Department report on Jackson Square. The December 1996 report also discusses the project effects, including demolition of the Colombo Building, and related urban design effects.

During preparation of this DEIR, the State Office of Historic Preservation confirmed that the status of the Colombo Building had changed from "potentially eligible" to "eligible" (DEIR p. 64, paragraph 2), based on the December 1996 Page & Turnbull report. The DEIR concludes that demolition of the National-Register-eligible Colombo Building would be a significant impact (DEIR pp. 67-68). While the December 1996 Page & Turnbull report provides additional information on the architectural characteristics of the Colombo Building, adequate information was gathered from sources cited in the DEIR to make a finding of significance. For informational purposes, the December 1996 discussion of the Colombo Building has been added to DEIR Appendix B and is reproduced at the end of the responses to Letter 9. The following has been added at the end of the second paragraph on DEIR p. 64:

> **Page & Turnbull prepared supporting documentation for the Section 106 process. Excerpts discussing the Colombo Building can be found in Appendix B.**

Response 9-12

The location of the project site with respect to the Jackson Square Historic District is stated in the third full paragraph on p. 65 of the DEIR. The location of the project site with respect to the Chinatown Historic District is stated in the first partial paragraph on p. 66 of the DEIR. The same paragraph refers to DEIR Appendix B, Figure B.1, a map depicting the location of the project site with respect to the existing historic districts. For additional clarification, the following change has been made to the first sentence of the third full paragraph on p. 65 of the DEIR:

> **The Jackson Square Historic District is located east of the project block; it is bounded on the west by Columbus Avenue, on the east by Sansome Street, and on the south by Washington Street, and extends nearly as far as Broadway on the north (see Appendix B, Figure B.1). The project site is outside of the district boundaries.**

As discussed on DEIR pp. 65-66, HUD determined that only certain properties contributing to the Chinatown Historic District were eligible for inclusion on the National Register. As discussed in the Response to Comment 9-14, it is the opinion of the State Historic

Preservation Officer that the entire Chinatown Historic District meets applicable National Register criteria as a historic district. Notwithstanding the SHPO listing, a federal agency must make a finding of eligibility through the Section 106 process before such an opinion could have legal standing and place the Chinatown Historic District on the National Register. As noted, the Chinatown Historic District has been listed on the State Register of Historic Resources. To clarify the status of the Chinatown Historic District, the following sentence has been added before the last sentence of the first partial paragraph on p. 66 of the DEIR:

> **As part of Section 106 review, SHPO found that Chinatown Historic District, as defined by the LPAD case report, was, with minor differences, eligible as a National Register district. SHPO listed the Chinatown Historic District on the State Register of Historic Resources on January 1, 1998./6A/**

A new footnote 6A has been added on p. 70 of the DEIR, after footnote 6:

> **6A. Marilyn Lortie, Staff, State Office of Historic Preservation, telephone conversation, March 20, 1998.**

As discussed on DEIR p. 69, demolition of the Colombo and Fong buildings, which are in proximity to the Jackson Square Historic District and the Chinatown Historic District, "would have no direct physical effect on buildings within the historic districts. The project would not have a substantial adverse impact on the integrity of the historic districts or other adjacent resources." The status of the Chinatown Historic District, now listed on the State Register of Historic Resources, does not change that conclusion.

Response 9-13

The report entitled *Chinatown Historic District* was prepared by Philip Choy for the Landmarks Preservation Advisory Board to aid in their decision whether or not to nominate the Chinatown Historic District for listing on the National Register of Historic Places. The report is included in the December 1996 Page & Turnbull report as part of the information gathered in response to Section 106 requirements. The report contains a general discussion of the architectural history of Chinatown. The report also discusses the commercial architecture found in the vicinity, as well as design and construction quality of buildings. The report does not discuss specific buildings.

The *Jackson Square Survey* was considered in the 1987 FEIR, and is discussed on pp. 230-231 and p. A-44b of that document. Jackson Square was listed on the National Register of Historic Places in 1971, as indicated on p. 65 of the DEIR. The district was re-surveyed by the Planning Department in 1978, and additional ratings were given to buildings in the district. *North Beach San Francisco: An Architectural, Historical and Cultural Survey,* by Anne Bloomfield, Daniel Warner, and Nancy Olmsted was cited in the 1987 FEIR on pp. 53 and A-44c. Information from these documents are incorporated into the DEIR by reference, as indicated on DEIR p. 62.

These documents do not provide significant new information for consideration and do not change the conclusions of the DEIR. The Jackson Square and Chinatown Historic Districts are discussed on pp. 65-67 and 69 of the DEIR. The buildings on the project site are outside the boundaries of both historic districts. Demolition of the Colombo Building has been identified as a significant unavoidable impact.

Response 9-14

As discussed above, historic resources in the vicinity of the project have been evaluated in several reports. In August 1996, Page & Turnbull prepared an analysis for the 1996 SEIR, then prepared a subsequent report in December 1996 as part of the Section 106 process. In these analyses, Page & Turnbull identify buildings of historical significance and both historic districts in the vicinity of the project. The reports did not result in the identification of a third potential historic district, or identify the Fong Building or the Colombo Buildings as contributors to such a district. Rather, the Page & Turnbull reports identified the Fong Building, among others on the project block, as a building that, in the evaluator's opinion, could contribute to either the Chinatown or Jackson Square Historic Districts, should the boundaries of these districts be redefined and expanded to include the project block.

As part of the Section 106 process initiated by the development proposal for lots adjacent to the project site (the St. Mary's project on Site A), the U.S. Department of Housing and Urban Development (HUD) defined an Area of Potential Effect (APE) which included all parcels within a one-block radius of the project site. This review noted the Chinatown and Jackson Square Historic Districts and identified buildings which were either individually eligible for listing on the National Register of Historic Places or were contributory to an established historic district. During the Section 106 process described on DEIR p. 64, the HUD regional office reviewed the December 1996 Page & Turnbull report. Among other matters related to historic properties, HUD considered the Page & Turnbull evaluation that eight buildings on the project block were, in the opinion of Page & Turnbull, contributory to an expanded Jackson Square Historic District or Chinatown Historic District. In correspondence to SHPO in March 1997, HUD stated the following:

> "Several buildings within the APE are neither located within the listed Jackson Square Historic District or the eligible Chinatown Historic District. One building is within Block 177, and seven buildings are within Block 195 (Appendix B). The historic architectural report prepared by the consultant [Page & Turnbull, Inc.] indicates these buildings may be contributors to an historic district. However, it is our conclusion that these properties are not contributors to either one of the districts. They do not relate to either one of the districts because: 1) Columbus Avenue creates a wide (six traffic [lane] intrusion between these eight buildings and Jackson Square Historic District that would disrupt district continuity, and 2) the buildings are isolated from the Chinatown District by Kearny Street and vacant parcels (Block 195/Lots 4, 5, 9, 10, 11, and 13), as well as modern and high rise buildings, such as the Holiday Inn and Washington/Montgomery Street Tower and others (Block 177, Lot 22; Block 176, Lot 11; and Block 208, Lots 24, 28/29/61."/4/

SHPO, in correspondence to HUD in September 1997, reviewed the HUD conclusion on these buildings on the project block:

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4. Letter from Tom Azumbrado, Chief, Multifamily Production Branch, U.S. Department of Housing and Urban Development, to Cherilyn Widell, State Historic Preservation Officer, California Department of Parks and Recreation, re: International Hotel Senior Housing, Kearny and Jackson Streets, San Francisco, CA, Project No. 121-EE059-NP-WAH, May 28, 1997.

> "HUD has determined that the properties within its APE outlined at Appendix B of your March 28, 1997 letter are neither listed in nor eligible for listing in the National Register. We do not object to your determination."/5/

The HUD and SHPO documentation cited above is consistent with the DEIR conclusions that, other than the demolition of the Colombo Building, the proposed project would have no direct or indirect effects on historic properties or historic districts eligible for the National Register. No other reports or public agencies have formally identified a Columbus Avenue/North Beach Corridor for evaluation as an historic district. Therefore, the EIR does not address such a district.

Response 9-15

The discussion on DEIR p. 40 cited in the comment is part of Section III.A. Land Use and Zoning, and describes generally the land uses in the vicinity, including Jackson Square. That DEIR section is not intended to be a complete discussion of architectural resources. Such a discussion is found in DEIR Section III.C, Historical and Architectural Resources.

The Jackson Square Historic District is an established City Landmark and National Register landmark district, and contains individual buildings which are City landmarks or are listed on the National Register of Historic Places. This district and the Chinatown Historic District are identified on p. 65 of the DEIR and in DEIR Figure B.1. Please refer to Response 9-13 for a discussion of reports concerning architectural and historical resources.

For informational purposes, Figure B.2 has been added to Appendix B of the DEIR, as shown on the following page. The following has been added to the end of the first paragraph on DEIR p. 67:

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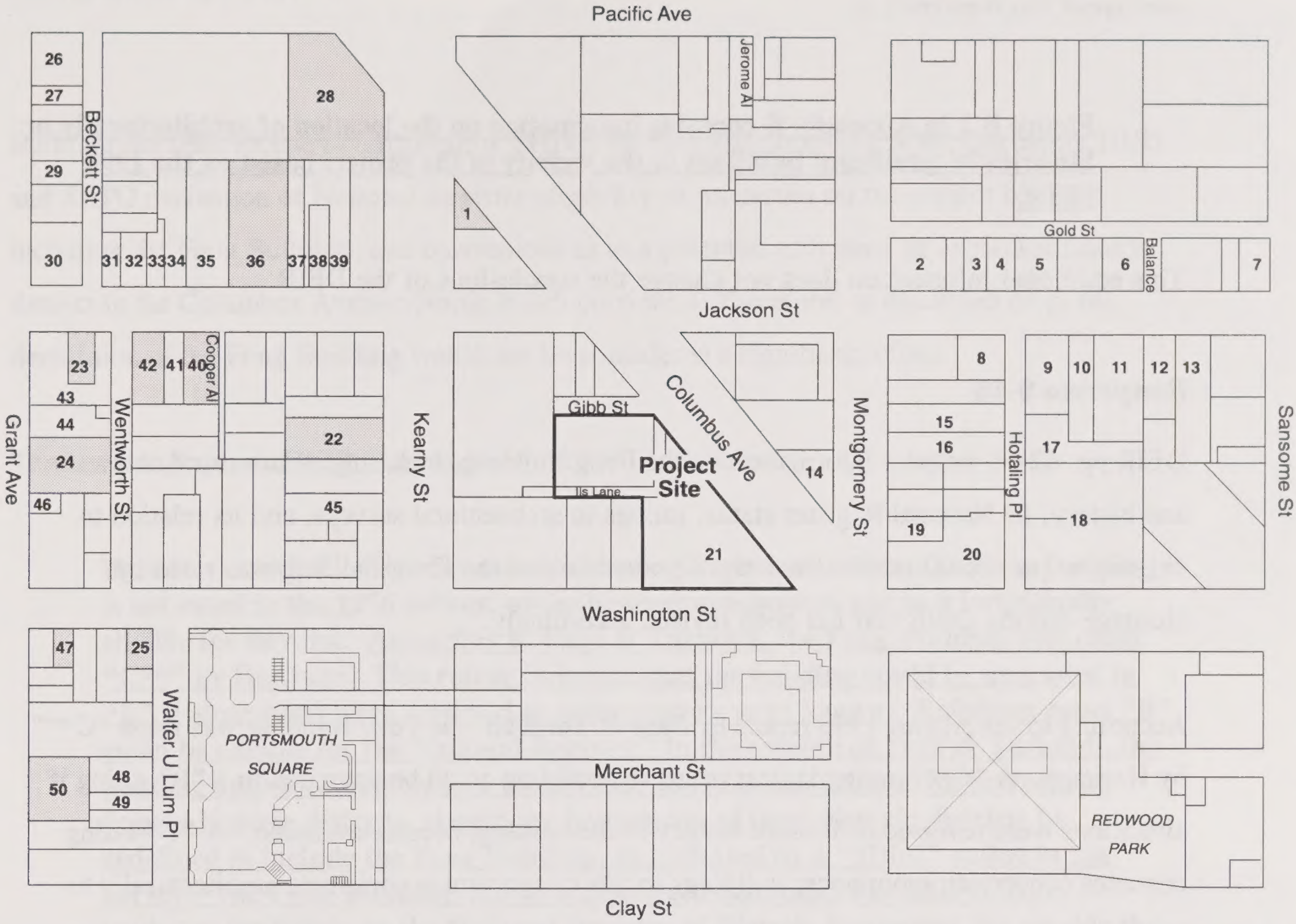
5. Letter from Cherilyn Widell, State Historic Preservation Office, to Tom Azumbrado, Chief, Multifamily Production Branch, U.S. Department of Housing and Urban Development, re: Development of International Hotel Senior Housing, San Francisco, #121-EE059-NP-WAH, September 15, 1997.

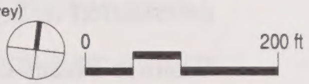

Pacific Ave
26
27
28
Beckett St
29
1
Jerome Al
Gold St
Balance
30
31 32 33 34 35 36 37 38 39
2 3 4 5 6 7
Jackson St
23
42 41 40
Cooper Al
8
9 10 11 12 13
43
44
Gibb St
Columbus Ave
15
16
17
Grant Ave
24
22
Kearny St
Project Site
14
Montgomery St
Hotaling Pl
Sansome St
46
Wentworth St
45
Ils Lane
18
19
20
21
Washington St
47
25
Walter U Lum Pl
PORTSMOUTH SQUARE
48
50
49
Merchant St
REDWOOD PARK
Clay St

LEGEND

		Landmark No & Effective Date		S.F. DCP Inventory	Heritage
1	Columbus Tower (Sentinel Building)	33	6/70	5	A
2	800-804 Montgomery St.	26	3/70	4	
3	470 Jackson St.	22	3/70		
4	472 Jackson St.	23	3/70	4	
5	458-60 Jackson St.	25	3/70		
6	432 Jackson St.	24	3/70	3	
7	400 Jackson St.	27	3/70	2	
8	473 Jackson St.	20	3/69	5	
9	451 Jackson St.	12	2/69	5	
10	445 Jackson St.	13	2/69	5	
11	441 Jackson St.	14	2/69	4	
12	415-31 Jackson St.	15	2/69	4	
13	407 Jackson St.	16	2/69	1	
14	Old Transamerica Bldg (4 Columbus Ave.)	52	3/73	4	
15	728-30 Montgomery St.	10	2/69	3	
16	Belli Bldg (722 Montgomery St.)	9	2/69	4	
17	32-42 Hotaling Pl.	11	2/69	5	
18	580 Washington St.			3	
19	710 Montgomery St.			3	
20	700 Montgomery St.			3	
21	Colombo Bldg (1 Columbus Ave.)			3	B
22	833 Kearny St.			3	B
23	675 Jackson St.			3	
24	930 Grant Ave.			3	B
25	743 Washington St.			3	C

		Heritage
26	1056-66 Grant Ave.	C
27	1050 Grant Ave.	C
28	935-51 Kearny St.	C
29	1024-26 Grant Ave.	C
30	1000-22 Grant Ave.	C
31	670 Jackson St.	C
32	662 Jackson St.	C
33	656 Jackson St.	C
34	650 Jackson St.	C
35	640 Jackson St.	C
36	626-36 Jackson St.	B
37	622 Jackson St.	C
38	614 Jackson St.	C
39	608 Jackson St.	C
40	645-49 Jackson St.	B
41	655-57 Jackson St.	C
42	661-65 Jackson St.	B
43	952-66 Grant Ave.	C
44	940-50 Grant Ave.	C
45	825 Kearny St.	A/B
46	918-20 Grant Ave.	B
47	743 Washington St.	A
48	21 Walter Lum (Brenham) Pl.	B
49	17-19 Walter Lum (Brenham) Pl.	B
50	824-32 Grant Ave.	A

▨ Structures on the list of significant buildings in Chinatown (1985 Chinatown Survey)



Source: San Francisco Planning Department

EIP

Architecturally Significant Buildings in the Project Vicinity Figure B.2

Figure B.2 in Appendix B contains information on the location of architecturally or historically significant buildings in the vicinity of the project based on the 1996 SEIR.

This additional information does not change the conclusions of the DEIR.

Response 9-16

DEIR pp. 62-66 includes information on the Fong Building, including architectural character and history, its National Register status, ratings in architectural surveys, and its relation to existing or proposed historic districts. As noted below, the Fong Building was rated by Heritage and the DEIR text has been revised accordingly.

According to the August 1996 report by Page & Turnbull, the Fong Building was rated "C**" by Heritage. A "C**" rating indicates that the building could be upgraded to a "B" rating if alterations were reversed or if more history of the building became available. A "C" rating connotes contextual importance; buildings in this category may contribute architecturally to historic districts. A "B" rating indicates a building of architectural or historical importance, one that could be eligible for the National Register. The Fong Building also received a "3D(o)" rating in the Page & Turnbull survey. As indicated in that report, this rating indicates that a building appears eligible as a contributor to a fully documented historic district. The Page & Turnbull evaluator felt that the Fong Building could be a contributor to either the Chinatown Historic District or the Jackson Square Historic District in the event that their boundaries were redefined.

This information about the Fong Building was repeated in a second report prepared by Page & Turnbull in December 20, 1996, *Kearny Street/Columbus Avenue Project, Section 106, NHPA: Supporting Information*. As noted on DEIR p. 69, the Fong Building was subsequently determined in September 1997 by SHPO to be ineligible for listing on the National Register of Historic Places and is located outside of the boundaries of the Chinatown and Jackson Square Historic Districts and is not considered to contribute to either district. The status of the Fong

Building has been recently confirmed by SHPO./6/ (See also Response 9-14, discussing HUD and SHPO evaluation of National Register eligibility of properties on the project block, including the Fong Building, and conclusions as to a potential additional or expanded historic district in the Columbus Avenue/North Beach corridor.) Therefore, as discussed on p. 69, demolition of the Fong Building would not be considered a significant effect.

The last paragraph on DEIR p. 66 has been revised as follows:

> **Based on a review of San Francisco Planning Department data, the Fong Building is not rated in the 1976 survey. ~~or in the Heritage Survey,~~ nor is it individually eligible for any list. According to Page & Turnbull, the Fong Building was rated "C**" by Heritage. This rating indicates that the building could be upgraded to "B" if alterations were reversed or more history were known. Buildings rated "B" could be eligible for the National Register. In the opinion of Page & Turnbull, the building appeared eligible as a contributor to either the Chinatown or Jackson Square historic districts, should the boundaries of these historic districts be redefined to include the Fong Building, as indicated by a "3D(o)" rating in the survey. The Fong Building, however, has been determined by SHPO to be ineligible for listing on the National Register of Historic Places and lies outside the boundaries of the Chinatown and Jackson Square Historic districts, the two recognized historic districts in the project vicinity. It is rated as "compatible" in the Chinatown Area Plan./7/ Buildings rated "compatible," while not architecturally significant, are considered contributory to the historic character of Chinatown.**

The Fong Building is described on p. 69 of the DEIR as "compatible," that is, contributory to the architectural character of Chinatown as set forth in the *Chinatown Area Plan*, an Area Plan of the San Francisco General Plan. This rating does not indicate individual architectural significance.

CEQA Public Resources Code, Section 21084.1 requires a lead agency to determine whether a project may impact a historical resource. As defined by Section 21084.1, a historical resource is listed in, or is determined to be eligible for, the California Register of Historical Resources,

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6. Natalie Thompson, Staff, State Office of Historic Preservation, telephone conversation, July 14, 1998.

included in a local register, or treated by a local agency as such. The State Office of Historic Preservation does not list the Fong Building as eligible for inclusion in the National Register of Historic Places. Because the Fong Building is not an architecturally significant resource, mitigation measures associated with its potential demolition have not been identified in the DEIR. Due to the interest expressed in comments regarding the architectural character of the Fong Building, the following mitigation measure is proposed to further reduce the less-than-significant impact of demolishing the Fong Building. This measure has been added to DEIR p. 112:

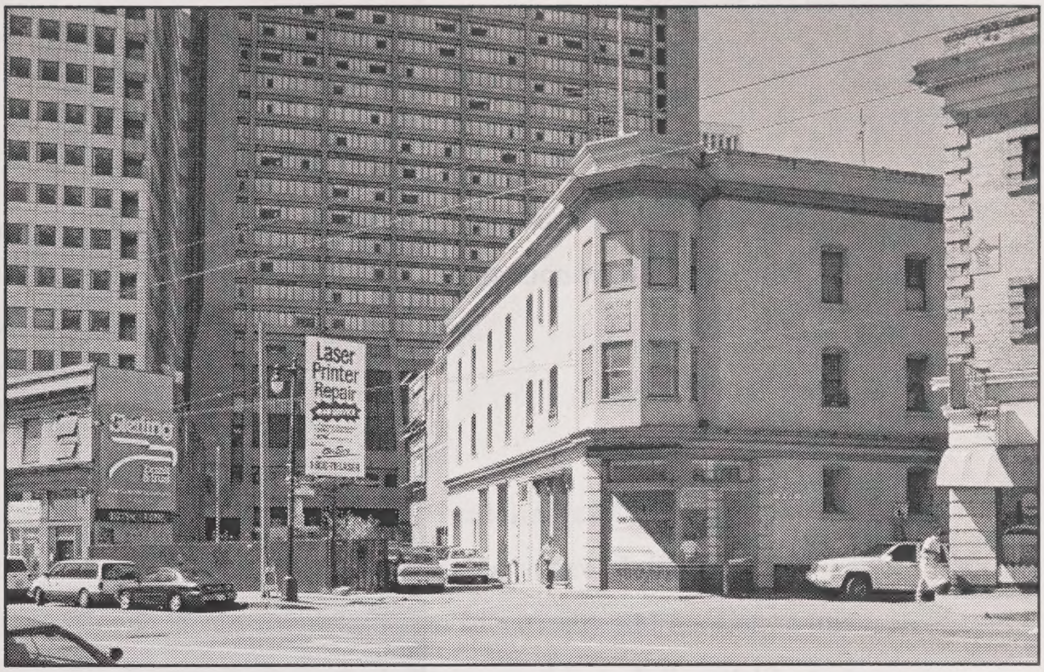
> **AR-2 Historic Documentation of the Fong Building: Prior to the demolition of the Fong Building, the District would prepare historic documentation which would include a written description of the Fong Building and photographic documentation of the exterior of the Fong Building. Photographic documentation would be prepared to HABS standards of detail and quality for photographic documentation in 4x5 or 5x7 photographs and negatives.**

Response 9-17

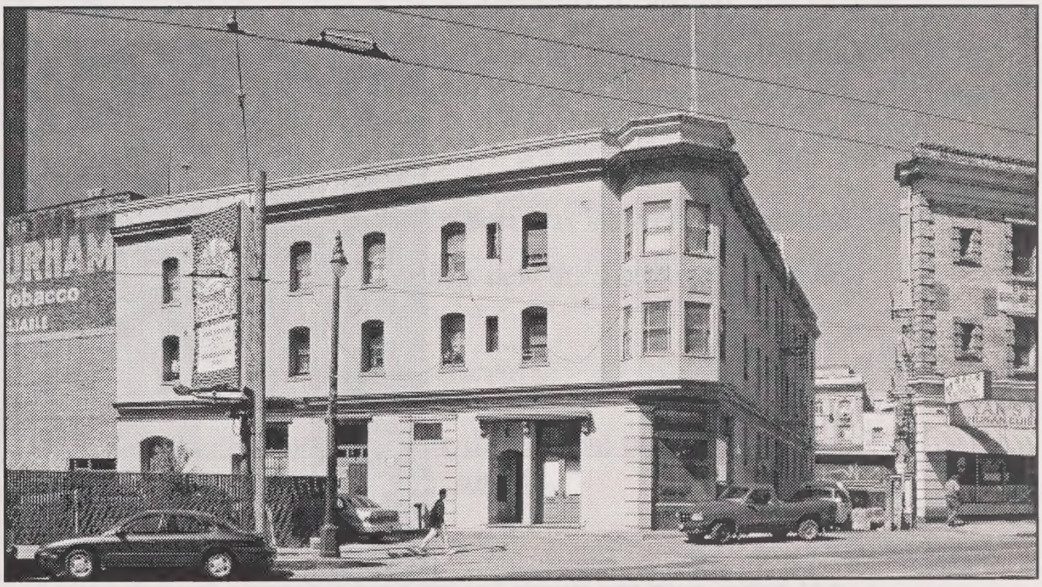
Figure 16A on p. 59 of the DEIR shows the octagonal corner bay of the Fong Building projecting onto Columbus Avenue. Photographs of the Fong Building looking in the southwest and south directions from Columbus Avenue, and photographs showing the architectural detail of the building have been added to the EIR on pp. 63b and 63c as Figures 18-4 and 18-5, respectively, and are reproduced on the next two pages. Please also see Response 9-38 regarding photographs of the Colombo Building.

The following text is added to the end of the first full paragraph on DEIR p. 63:

> **Figures 18-4 and 18-5 include photographs of the Fong Building.**


Laser
Printer
Repair

A — View south from Columbus Avenue

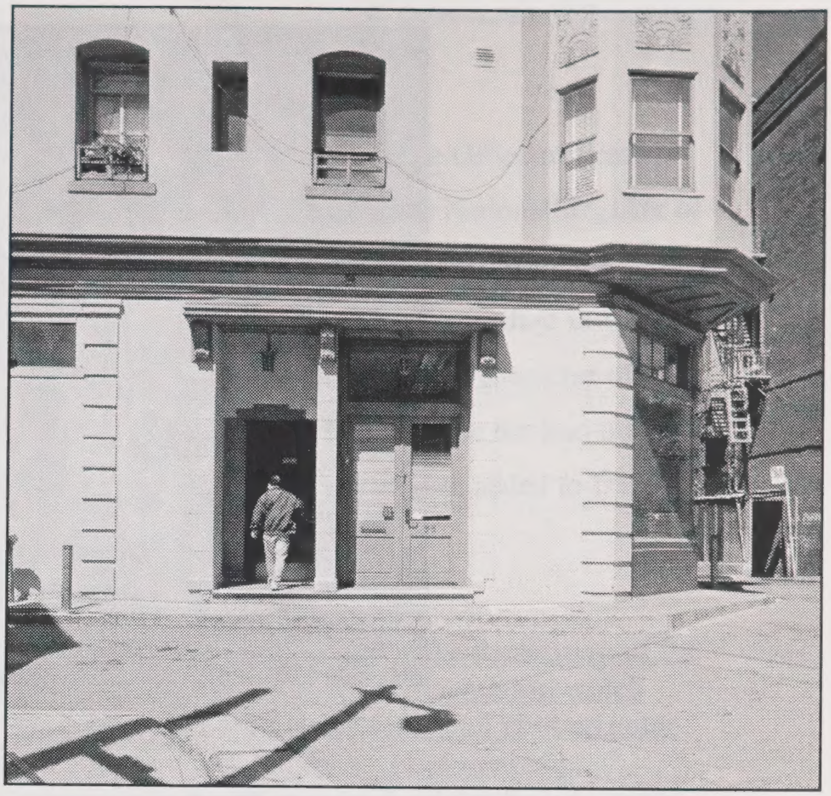

URHAM
Tobacco

B — View west at Gibb Street

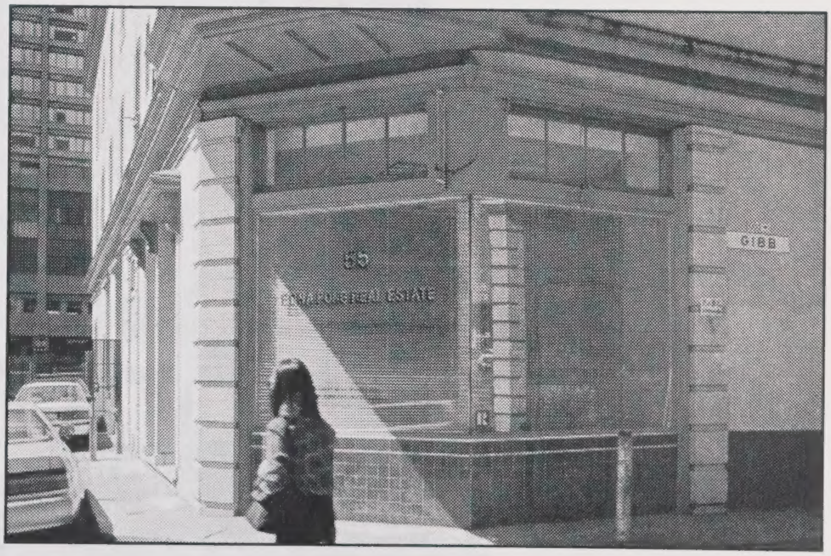
Source: Square One Productions

EIP ASSOCIATES

Views of the Fong Building **Figure 18-4**



A — Columbus Avenue Entrance



55
FONG REAL ESTATE
GIBB

B — Corner of Ils Lane and Gibb Street

Source: Square One Productions

Views of Fong Building Details Figure 18-5

Response 9-18

The relationship of the Colombo Building to Columbus Avenue and the Old Transamerica Building as a gateway to North Beach is described in DEIR Section III.B, Aesthetics. Please see Response 9-38, below, regarding urban design concerns.

Response 9-19

The Initial Study (see Appendix A of the DEIR) reviewed cultural resources analyses conducted for the 1987 FEIR and 1996 SEIR. Those analyses covered Lots 4 and 5 of the project site. Archival research conducted for the DEIR to specifically address Lot 12 (the Fong Building site) resulted in a background report that addressed Lots 4, 5, and 12. Because the report's findings on potential impacts and recommendations are similar to those of the investigations previously conducted on Lots 4 and 5, the mitigation measures developed for the Chinatown/North Beach Campus project are essentially the same as those previously developed in the 1996 SEIR for Lots 4 and 5. See pp. A.30 - A.32 in Appendix A, and pp. 108 - 110 of the DEIR for mitigation measures that would reduce cultural resources impacts to less than significant.

Because reference to the new archaeological background report was inadvertently omitted from the Initial Study, the following sentence has been added as a new third sentence to the first paragraph on p. A.30 in Appendix A of the DEIR:

> **An archaeological resources report prepared for the current proposed project makes similar findings with respect to Lots 4, 5, and 12.[5A]**

Footnote 5A for the new archaeological resources background report has been added to p. A.47 in Appendix A of the DEIR, as follows:

> **5A. Archeo-Tec, *Archival Cultural Resources Evaluation of the Chinatown/North Beach Center EIR Project, Located Within a Portion of the Block Bounded by Jackson Street, Washington Street, Kearny Street and Columbus Avenue, City***

***and County of San Francisco, California*, prepared for EIP Associates, February 1998.**

Response 9-20

As stated in the second paragraph on p. 69 of the DEIR and shown on Figure B.1 in Appendix B of the DEIR, the project site is not within the boundaries of the Jackson Square Historic District, and demolition of the Colombo Building would have no direct physical effect on buildings within the historic district. The impact associated with demolition of the Colombo Building is that it is eligible for listing on the National Register of Historic Places, and its demolition would be a significant impact.

The cited discussion in the December 1996 Page & Turnbull report regarding the relationship between the Jackson Square Historic District and the Columbus Avenue corridor, and between the Old Transamerica Building and the Colombo Building are noted. Those comments appear to address primarily the visual relationships between the Jackson Square buildings and buildings on the west side of Columbus Avenue. Responses 9-38 to 9-40 below, discuss the change in scale of development with the project. While the Page & Turnbull report considers that change to be an adverse effect, it is the judgment of the preparers of the DEIR that, taken in the context of the range of building scale in the Chinatown, North Beach, and Jackson Square area, the proposed project would not have a significant adverse effect on the visual character of the project vicinity. As discussed below, in Response 9-21, the final project design will consider the appropriate relationship to adjacent architectural resources.

Response 9-21

DEIR p. 39 in Chapter II, Project Description, states that:

> "[w]hile there is some architectural detail shown on Figures 3 through 12, the design of the building is only schematic and subject to change. As stated above as one of the project objectives, the proposed facility would be designed to be compatible with the surrounding neighborhoods of the Chinatown, North Beach,

> and Financial Districts. Detailed architectural design would be developed at the time of proposed construction, which would not be for several years."

This project description is the basis for the DEIR analysis and conclusions concerning aesthetic effects and relationship to architectural resources and historic districts. It would be expected that a final project design that was consistent with the height and bulk and general design presented in the DEIR would not require further CEQA review. However, at the time of review of any final design, the District would consider whether substantial changes in the project or other new information would require further environmental review under CEQA Guidelines Sections 15162, 15163, or 15164. As noted, because funding for project development could be two to five years in the future, discussion of the final project design in the EIR would be too remote and speculative.

DEIR p. 18 also states one project objective as:

> "Architectural Design: The final design of the new campus facility should relate appropriately to the historic fabric of any adjacent architectural and historic resources. The District would consult with neighborhood and community groups regarding architectural design."

DEIR, pp. 55-61 in Section III.B, Aesthetics, and pp. 67-69 in Section III.C, Historical and Architectural Resources, reviews the current project description, proposed building massing and height, and building location, and concludes that the project would not have significant adverse effects on aesthetics, or on architectural resources or historic districts, other than the Colombo Building.

Response 9-22

DEIR pp. 39-46 in Section III.A, Land Use and Zoning, generally describe land uses in the vicinity, including Jackson Square. That DEIR section is not intended to be a complete discussion of architectural resources. Such a discussion is found on DEIR pp. 62-67 in Section III.C, Historical and Architectural Resources. Please see Response 9-38 regarding the gateway to North Beach.

Response 9-23

DEIR pp. 53-55, and Figures 15 to 18 describe the range of building heights on the project site and vicinity, and, as cited in Response 9-38, the DEIR discusses the contrast between high-rise development in the Financial District and lower-scale development in North Beach. For information, the following has been added to the end of the second paragraph on DEIR p. 53:

> **Figure B.3 in Appendix B is a map of building heights in the vicinity, published in the 1987 FEIR. While some development has occurred since the map was prepared in 1987, the map provides accurate information on most existing building heights in the vicinity.**

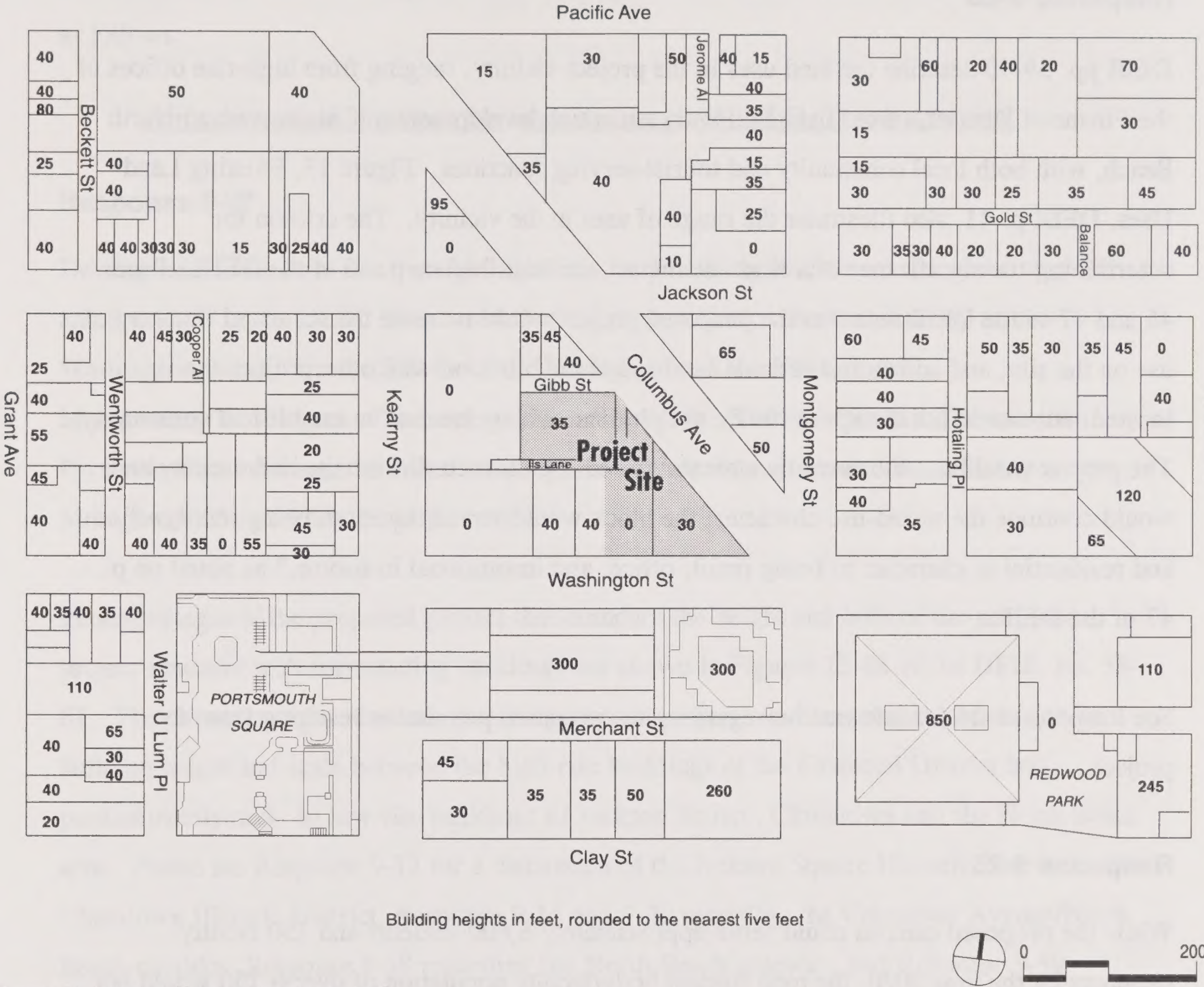
Figure B.3 has been added to Appendix B of the DEIR, as shown on the following page.

Response 9-24

The occupants of buildings in the nearby area are discussed in the Land Use setting section, pp. 39-42 of the DEIR. The land uses and general character of each of the four districts --the Financial District, Jackson Square, North Beach, and Chinatown-- are described and shown on Figure 13, p. 41 of the DEIR.

There are about 40 residential land uses scattered throughout the project vicinity, ranging from multi-unit complexes to single family uses above ground floor retail to multi-unit uses above primarily office buildings (for example, the Montgomery/Washington office and residential building). Residential uses are concentrated along Grant Avenue, Kearny Street, and Jackson Street west of Kearny Street.

As noted on DEIR p. 50, the loss of 21 residential units would represent 0.5% of the total number of rental units available in the Chinatown/North Beach neighborhood that are within the range of monthly rental fees currently charged for units in the Fong Building. The information provided in the DEIR provides context with which to assess the loss of the 21 residential units.


Pacific Ave
Jackson St
Washington St
Merchant St
Clay St
Grant Ave
Beckett St
Wentworth St
Cooper Al
Kearny St
Columbus Ave
Montgomery St
Hotaling Pl
Sansome St
Jerome Al
Gold St
Balance
Gibb St
Ils Lane
Walter U Lum Pl
Project Site
PORTSMOUTH SQUARE
REDWOOD PARK
40 40 80 25 40
50 40 40 40
40 40 30 30 30 15 30 25 40 40
15 30 50 40 15 40 35 40 15 35 25 0
35 40 40 95 0 10
30 60 20 40 20 70 15 30 15
30 30 30 25 35 45
30 35 30 40 20 20 30 60 40
40 25 40 55 45 40
40 45 30 25 20 40 30 30
25 40 20 25 45 30 30
40 40 35 0 55
35 45 40 0 35 65 50
0 40 40 0 30
60 45 40 40 30 30 40 35
50 35 30 35 45 0 40 40 120 30 65
40 35 40 35 40 110 65 40 30 40 40 20
300 300
45 30 35 35 50 260
850 0 110 245
0
200 ft

Building heights in feet, rounded to the nearest five feet

Source: San Francisco Planning Department, 1987.

EIP

Building Heights in the Project Vicinity Figure B.3

Chinatown/North Beach Campus EIR

Response 9-25

DEIR pp. 39-40 describe the land uses in the project vicinity, ranging from high-rise offices of the Financial District, mixed-use retail and residential development in Chinatown and North Beach, with both local community and tourist-serving functions. Figure 13, Existing Land Uses, DEIR p. 41, also illustrates the range of uses in the vicinity. The criteria for determining the significance of a land use impact are described on p. 46 of the DEIR. Pages 46 and 47 of the DEIR note that the proposed project would increase the scale and intensity of use on the site, and add an institutional land use to the block on which the project site is located, but would not disrupt or divide the physical arrangement of an established community. The project would not substantially alter the mixed-use character of the site and vicinity and would continue the mixed-use character; the block would "transition from being retail, office and residential in character to being retail, office, and institutional in nature," as noted on p. 47 of the DEIR.

See Response 9-26 for information regarding the proposed population resulting from the project.

Response 9-26

While the proposed campus could serve approximately 6,600 students and 150 faculty members by the year 2020, the total student body/faculty population of over 6,750 would not be on the site at one time. Given that the proposed campus would likely contain up to about 30 regular classrooms capable of holding 45 students and up to about 15 special purpose classrooms capable of holding 35 students, a maximum total of about 1,875 students could be accommodated on the project site, exclusive of those studying in the library, registering for classes, or using other spaces in the building./7/ Even this estimate is high, because it is unlikely that all classrooms would operate at 100% capacity at any given time. The total campus population during the period of heaviest use is estimated to range between 1,500 and 1,800 individuals, including about 45 instructors.

---

7. Joanne Low, Dean, Chinatown/North Beach Campus, telephone communications, June 4 and 5, 1998.

For clarification, the following has been added to the end of the second full paragraph on p. 47 as follows:

For a discussion of pedestrian impacts, see p. 85, III.D, Transportation.

Response 9-27

Development scale (low-rise through high-rise), and building heights are discussed on p. 40 and pp. 53-57 of the DEIR. It is noted that the project block is located directly across Washington Street from the 300-foot-tall Holiday Inn and the 300-foot-tall Montgomery/Washington office and residential building. The 850-foot-tall Transamerica Pyramid office building, the tallest building in San Francisco, is located immediately across Montgomery Street from the project site.

Photomontages of the proposed project that compare the height and bulk of the proposed project structure with surrounding buildings are shown in Figures 15-18 of the DEIR, pp. 58-61. The photomontages illustrate that the proposed project would represent a transition in building height and scale between the high-rise buildings of the Financial District and predominantly mid- to low-rise buildings of Jackson Square, Chinatown and the North Beach area. Please see Response 9-12 for a discussion of the Jackson Square Historic District and the Chinatown Historic District, Response 9-14 and 9-20 regarding the Columbus Avenue/North Beach corridor, Response 9-38 regarding the North Beach gateway, and Response 9-39 regarding building heights.

Response 9-28

The project's relationship to the objectives and policies of the *San Francisco General Plan Urban Design Element* is explained on pp. 48 and 49 of the DEIR, where it is noted that the project would be substantially consistent with the design goals presented in the *Urban Design Element*. The design goals in the Urban Design Element include, for example, that new construction should take into account that buildings, as seen together, "produce a total effect that characterizes the city and its districts" (Objective 1, Policy 3); that development "promote connections between districts" (Objective 1, Policy 7); and that development should "respect the character of older development nearby in the design of new buildings" (Objective 2, Policy 6). The design of the proposed project would support all of these goals. The proposed project is in a "connection" zone between the Financial District and the North Beach and Chinatown districts, and the DEIR makes clear that the design of the new building would take into account this important intermediate position (see DEIR p. 49). The proposed project would respect older development in the area, as evidenced in one of the project objectives, set forth on DEIR p. 18: the "final design of the new campus facility should relate appropriately to the historic fabric of any adjacent architectural and historic resources."

While there is no detailed architectural design at this time, it is reasonable to conclude, based on the proposed project objectives and discussion in the DEIR, that the final design would satisfy important design goals of the Urban Design Element, and that the proposed project would not be substantially inconsistent overall with design policies in that element.

The fact that the project would be inconsistent with Policy 4 of Objective 2 of the Urban Design Element, by demolishing an historic architectural resource, is analyzed in a separate section of the DEIR (Section III.C, Historical and Architectural Resources), and does not affect the conclusion that the proposed project would not be substantially inconsistent with design policies for new development set forth in the Urban Design Element.

Shadow effects are discussed in Appendix A of the DEIR, pp. A.25 and A.26, which concluded that because the project would not have shadow effects on open space, no further analysis was required. While the proposed project would add shadow to streets and sidewalks in the vicinity, depending upon the time of day and year, these would not be considered significant effects to be analyzed in the EIR.

See Response 9-21 for information regarding the proposed building design.

Response 9-29

The EIR acknowledges that the project is inconsistent with policies in the City General Plan relating to housing. Please see Response 13-2. Please see Response 13-3 regarding additional mitigation to provide replacement housing in the Chinatown/North Beach area.

Response 9-30

As the comments note, Ils Lane is a public right-of-way. The project proposes a pedestrian connection over Ils Lane at the fourth and seventh floors of the adjoining buildings and subterranean parking below Ils Lane. Because no construction would occur on Ils Lane itself, no street vacation would be necessary. At the time of building construction, the District would obtain an encroachment permit from the City in order to construct the below-ground parking under Ils Lane. As is discussed in Response 3-5, closure of, and development on, Ils Lane could compromise life-safety exiting required by buildings fronting on Washington Street, and by the approved St. Mary's project on the west side of the project block.

Response 9-31

The EIR is not required to examine the environmental impacts that may be caused by some future decision by the District to exempt itself from local zoning ordinances or PUD requirements. The project here is the proposed acquisition of a site in Chinatown\North Beach for the future construction of a college building. Thus, the Draft EIR appropriately discusses consistency with zoning ordinances for the purpose of identifying any significant environmental impacts caused by the project. See DEIR pp. 50-51 and Response 9-6. If the District decides in the future to pursue the college construction project and to exempt itself from zoning requirements (including, for example, PUD requirements), a determination would be made at that time whether CEQA required additional environmental review. See also Response 9-1.

Response 9-32

The DEIR, second full paragraph, p. 49, states that the project "would not respond" to the *Urban Design Element* because the Colombo Building would be demolished. For clarity, the first sentence of the second full paragraph, p. 49, has been revised as follows:

> **The project would be inconsistent with ~~not respond to~~ Policy 4 of Objective 2 of the *Urban Design Element* because the Colombo Building, a structure that is eligible for the National Register of Historic Places, would be demolished as part of the project.**

The first sentence of the third paragraph, p. 3, has also been revised:

> **The project would be inconsistent with ~~not respond to~~ Policy 4 of Objective 2 of the *Urban Design Element* because the Colombo Building, a structure that is eligible for the National Register of Historic Places, would be demolished as part of the project.**

Response 9-33

See Response 9-21 and 9-28 for information regarding the building design and the *Urban Design Element*.

Response 9-34

The *Residence Element* is discussed on p. 48 of the DEIR. The DEIR states that the project would be substantially inconsistent with *San Francisco General Plan* policies related to housing. Please see Response 13-3 regarding mitigation measures relating to relocation assistance and the provision of replacement housing. Such measures minimize the housing impacts associated with the project and conform to the General Plan policies and objectives identified by this comment.

Response 9-35

As pointed out by the commenter, the Public School Facilities Plan (Map 6) does not indicate a City College campus at the project site location. DEIR p. 49, paragraph three, has been revised to read as follows:

> **The construction of an educational facility would support Objective 8 of the *Community Facilities Element*, which encourages fulfillment of the District's needs. ~~The immediate vicinity of the project site is identified in the *San Francisco General Plan* as a site for a Community College District facility that would enhance both the efficiency and effectiveness of the District./6/~~ Policy 1 states "Provide public school facilities for education in accordance with the need for such facilities as defined by the Unified School District and Community College District. Locate such facilities according to the Public School Facilities Plan and, wherever possible, make available for community use." The Public School Facilities Plan, Map 6, does not specifically identify the project vicinity as a Community College location. However, the District has clearly defined a need for public educational facilities in Chinatown. Therefore, the project would be substantially consistent with this objective.**

The above revision does not change the conclusions of the EIR.

Response 9-36

Conflicts between the various objectives and policies of the *San Francisco General Plan* are noted with reference to the proposed project itself. The EIR does not attempt to point out inconsistencies or conflicts that may or may not exist within General Plan objectives and policies. For example, the EIR indicates that the loss of historical resources resulting from project construction would conflict with the need to provide adequate District educational facilities in this particular case. Stated differently, while demolition of the Colombo Building would be inconsistent with Policy 4 of Objective 2 of the *Urban Design Element*, construction of the project would be consistent with Objective 8 of the *Community Facilities Element*, which encourages fulfillment of the District's needs.

Response 9-37

Proposition M Priority Policies, as noted in the comment, would apply to decisions carried out by the City itself. Prior to issuing a permit for any project that requires an Initial Study under CEQA or adoption of a zoning ordinance or development agreement, the City is required to find that the project or legislation is consistent with the Priority Policies and is consistent with the City's General Plan. The City Planning Commission, in its decision regarding the conformity of the project with the City's General Plan, would determine whether the project conforms with the Priority Policies. As part of the General Plan referral process for the project that the District is completing, the Planning Commission will specifically review the project's relationship to the Priority Policies (see Response 9-28). The EIR is not required to make findings of the project's conformity with Proposition M; that finding is in the purview of City decision makers.

Response 9-38

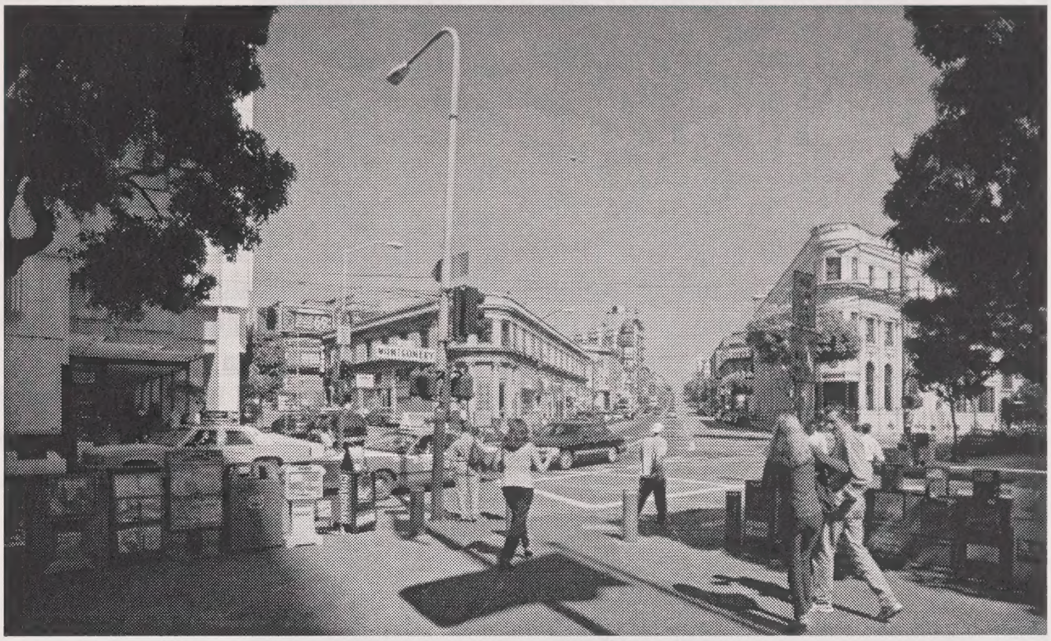
The DEIR includes discussion of the project site as an entry to North Beach. DEIR p. 53 in Section III.B, Aesthetics, notes that

> "North Beach is an older area of lower-scale development, located just to the north of the project site. The Colombo Building, together with the old Transamerica Building on the east side of Columbus Avenue, have traditionally marked the entrance to the North Beach district."

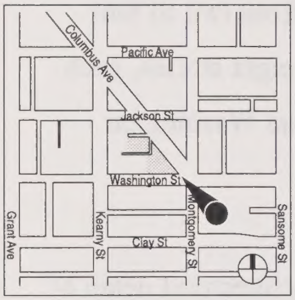
DEIR pp. 56-57 notes that

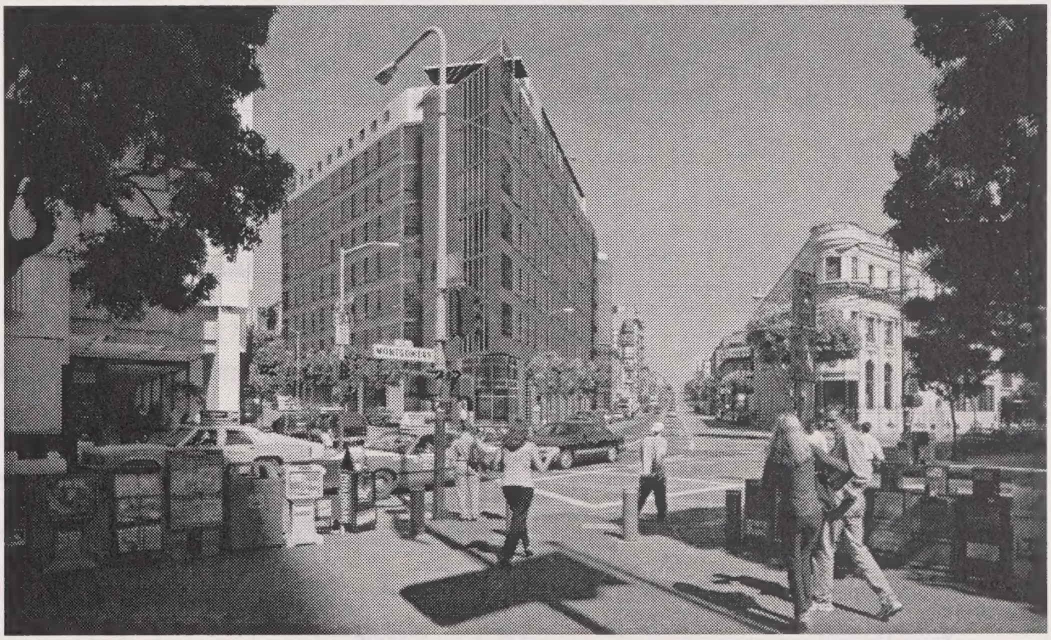
> "the overall effect of the project would be to add mid-rise building elements to Columbus Avenue and Chinatown that would contrast with the predominantly two- to four-story structures in North Beach, Chinatown, and Jackson Square. The project would be lower in height and less prominent than existing high-rise buildings in the Financial District to the south and east. The project would also be less prominent than the approved, 15-story St. Mary's project."

To provide additional information on the visual relationship of the Colombo Building to the Old Transamerica Building, visual elements of the Fong Building as seen from Columbus Avenue, and other buildings to the east, Figure 18-2, shown on the next page, has been added



A — Project Site


Columbus Ave
Pacific Ave
Jackson St
Washington St
Montgomery St
Sansome St
Grant Ave
Kearny St
Clay St



B — Proposed Project

Source: Square One Productions

Views from Transamerica Pyramid Figure 18-2

to the EIR as new p. 61a. In addition, the following has been added after the third paragraph, DEIR p. 55:

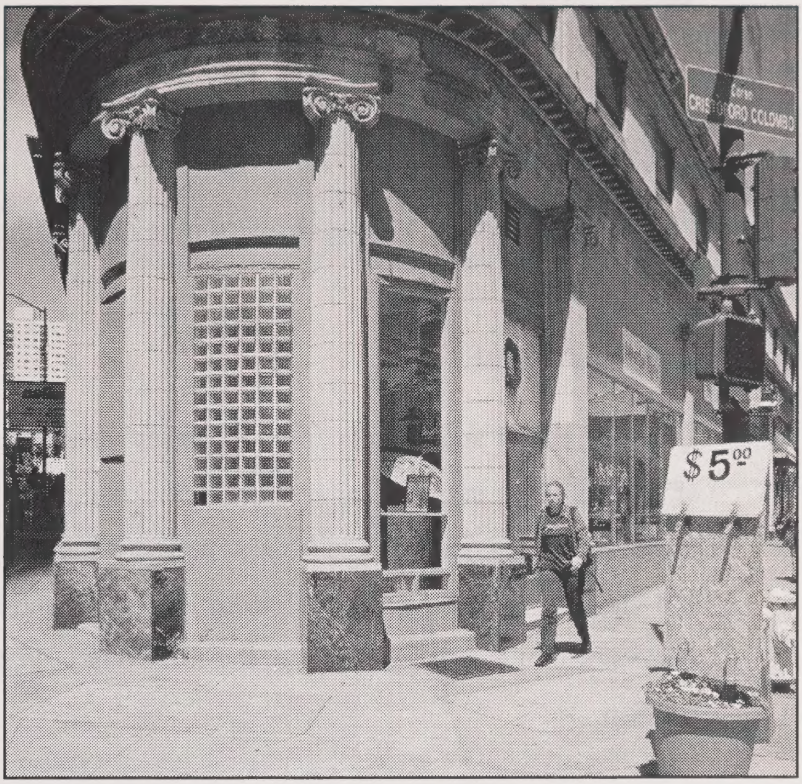
> **Figure 18-2A is a view from Montgomery Street and Washington Street, looking northwest up Columbus Avenue. Views include the two-story Colombo Building, the octagonal bay of the three-story Fong Building on the west side of Columbus Avenue, and the Old Transamerica Building on the east side of Columbus. The two-story Colombo Building and the octagonal bay of the Fong Building form part of the low-rise character of the west side of Columbus Avenue between Washington Street and Jackson Street. Other two- to eight-story buildings in the Columbus Avenue corridor are visible in the distance.**

To the east of the three-story Old Transamerica Building, not visible in the photograph, are other buildings in the Jackson Square Historic District that generally range from two to four stories, but include newer buildings in the Historic District that range up to eight stories, such as the 500 Washington Street building at the northwest corner of Sansome and Washington Streets.

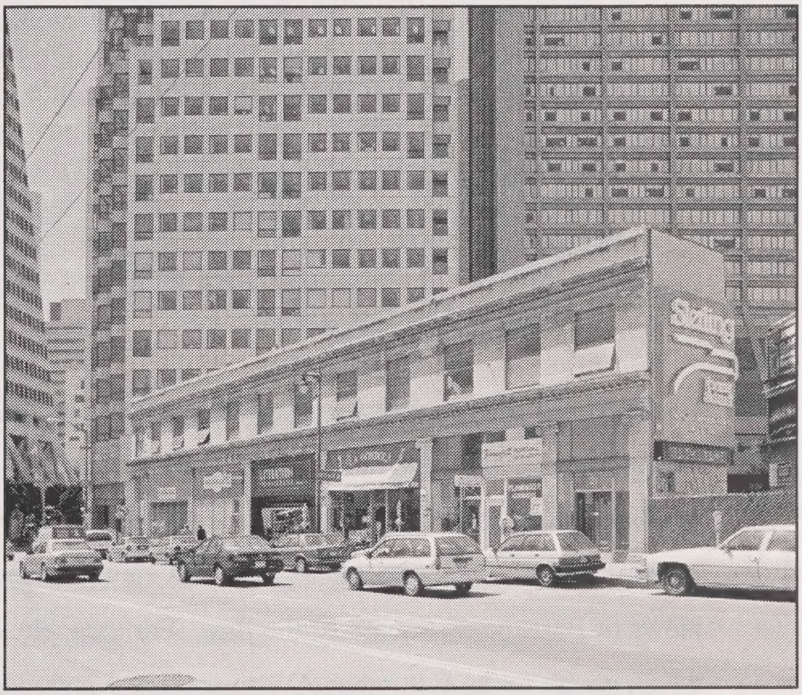
A new Figure 18-3 has been added to the EIR as new p. 63a, to show the architectural detail of the Colombo Building. The following has been added at the end of the first partial paragraph of DEIR p. 63:

> **Figure 18-3 includes photographs of the Colombo Building.**

The relationship of the Fong Building to Columbus Avenue is also addressed on DEIR p. 63 in Section III.C, Historical and Architectural Resources, first full paragraph: "Because the building fronts primarily on Ils Lane and Gibb Street, only one corner faces Columbus Avenue. . .The octagonal corner bay projects beyond the first floor flattened corner to relate to the Columbus Avenue frontage." See also Response 9-17, discussing views of the Fong Building, including new Figures 18-4 and 18-5 with additional photographs. Please see Responses 9-11 to 9-19 on historical and architectural resources, as referenced by the commenter.



A — Corner of Washington Street and Columbus Avenue



B — Columbus Avenue frontage

Source: Square One Productions

Views of the Colombo Building Figure 18-3

Response 9-39

Please see Response 9-23 regarding a map of building heights.

Response 9-40

DEIR pp. 55-57 and Figures 16 to 18 present analysis and conclusions regarding the project's effects on views in the vicinity. Views of Columbus Avenue are discussed on p. 56, and illustrated in Figures 15B and 16B. The DEIR appropriately describes the change in conditions and views of the site. To provide additional information on the relationship of the project to views north of Columbus Avenue, the following has been added as a new fifth paragraph, DEIR p. 56:

> **VIEWS FROM MONTGOMERY STREET**
>
> **In views north on Columbus Avenue from Montgomery and Washington Streets, the proposed seven- and eight-story building would contrast with the three-story Old Transamerica Building on the east side of Columbus (see Figure 18-2B). The view of this entrance to North Beach is now marked by the two-story Colombo Building and the Old Transamerica Building. The project would alter this existing view of the two older buildings, and replace it with one where the new, taller project would be seen with the Old Transamerica Building. Views up Columbus Avenue would continue to include the existing range of buildings types and heights north of the project site.**

Figure 18-2 has been added to the EIR as noted above in Response 9-38. The DEIR conclusions regarding the significance of visual impacts are based on the range of building heights already found in the area, the continued availability of views north on Columbus Avenue, and the lack of changes in public views of major visual landmarks, such as street-level views of Portsmouth Square or the Bay. For example, as noted on DEIR p. 57, existing development in the Columbus Avenue corridor includes the eight-story Columbus Tower, at Columbus north of Jackson Street. The Columbus Tower is seen on the west side of Columbus in Figures 15A and 15B. As City Landmark No. 33, that building is considered an important part of the Columbus Avenue streetscape.

Further, both the 1987 FEIR and the 1996 SEIR each reviewed development of up to 10 stories on Lots 4 and 5. Neither previous EIR, as certified by the City Planning Commission, found such development on the Colombo Building site to have significant adverse visual or aesthetic impacts.

Response 9-41

DEIR p. 57 notes that the proposed project would be "less prominent than the approved, 15-story St. Mary's project." That statement regarding the overall effects of a new building in the Columbus Avenue and Chinatown area is factually correct. The full paragraph is cited in Response 9-38.

DEIR pp. 34-36, Chapter II, Project Description, describes the status of the St. Mary's project, as approved in December 1996, with construction expected to begin in 1998. Development on Site A (the St. Mary's site) is considered, where appropriate, in the cumulative development context, such as in Section III.B, Aesthetics.

The District's proposed acquisition of Lots 4, 5, and 12 would have no effect on the previously approved PUD for Site A and Site B. Please see Responses 9-1 to 9-8 regarding the PUD.

Response 9-42

DEIR Section III.D, Transportation, uses analysis methodology primarily based on information from all of the Chinatown/North Beach satellite sites (excluding the Marina site), not just the main campus at 940 Filbert Street. Specifically, the percentages of students (70%) and faculty/staff (75%) that would be at the proposed consolidated campus on a typical weekday were provided by District staff and reflect all satellite locations. The data used for trip distribution were based on faculty/staff and student zip-code data for all Chinatown/North Beach satellite sites (except the Marina site). The information used to determine mode split for the project was based on survey data collected by the City College's Office and Research Planning Department, and compiled for all Chinatown/North Beach satellite sites.

Information from the main campus was used only to estimate what percentage of the faculty/staff and students would be arriving to and leaving the proposed campus during the weekday PM peak hour. The main campus was chosen to derive this percentage for two reasons: 1) most (approximately two-thirds) of the student enrollment and staffing at the Chinatown/North Beach Campus are at the main campus at 940 Filbert Street; and 2) similar to the class schedule that would be implemented at the proposed campus, the main campus offers classes all day long, from approximately 8:00 AM to 9:00 PM. The other satellite site locations offer classes only in the morning (between 8:00 AM and 12:00 noon) and/or the evening (between 6:00 and 9:00 PM), which are outside the PM peak hour (generally between 5:00 to 6:00 PM).

Response 9-43

In general, the weekday PM peak period (between 4:00 and 6:00 PM) represents the worst-case traffic conditions in San Francisco. Weekday traffic volumes are typically lower during all other times of the day. Before adding project-generated traffic to existing background traffic, both time periods must be the same. It would not be appropriate to add project traffic that would be generated in the morning to existing background traffic generated during the PM peak period. The survey at the main campus on Wednesday, February 25, 1998, was conducted between 4:00 and 6:00 PM, because this is the same period of the transportation analysis.

Page 20 of the DEIR states that almost half of all classes would be offered during the morning hours, between 8:00 AM and 12:00 noon. This statement refers to the number of classes offered, not the number of students at the campus. As described above, a one-hour period between 8:00 AM and 12:00 noon was not used in the analysis, because background traffic would be lower during that hour as compared to the PM peak hour. The combination of project and existing traffic during a one-hour period between 8:00 AM and 12:00 noon would result in lower total traffic volumes as compared to the combination of project and existing background traffic during the PM peak hour. Therefore, the transportation analysis was conducted for weekday PM peak hour conditions.

Peak parking demand for the proposed project was not estimated based on traffic generated during the PM peak hour. The peak parking period occurs when the greatest number of vehicles are parked at the same time (i.e., maximum parking accumulation). This typically occurs during the midday, not the PM peak hour. Data from the City College's Phelan Campus (24-hour driveway counts at the Balboa Reservoir parking lot) indicated that the maximum parking accumulation occurred between approximately 11:00 AM and 12:00 noon. The maximum parking accumulation was equivalent to about 25% of the total vehicle-trips. The estimated peak parking demand of 220 parking spaces, as identified on p. 83 of the DEIR, reflects the demand between approximately 11:00 AM and 12:00 noon.

Response 9-44

Since the proposed campus would essentially consolidate all the satellite site locations (except the Marina site), all students (and faculty/staff) attending morning and evening classes at the satellite sites would attend them (during the same time slot) at the proposed campus. Similarly, all students attending classes at the main campus would attend them at the proposed campus. The types of classes at the proposed campus, as well as the number of classes that would be offered during specific times, would be expected to be similar to those offered at each of the existing campus locations. Since the estimate of person-trips for the proposed centralized campus was based on the total student enrollment figure at all satellite site locations (except the Marina site), the proposed campus would be expected to generate a similar number of person-trips as at the existing satellite site locations.

In order to estimate how many trips would be generated by the projected 6,630 students during a typical weekday, District records indicate that about 70% of total enrollment would attend classes on a typical weekday, and this also accounts for students who leave the campus between classes and return to the campus later for another class.

The comment is correct in that the results of a survey conducted for the Needs Assessment Study (by Beverly Prior Architects) found that approximately 53% of the students would like to see more afternoon and evening classes. However, District staff have indicated that these additional classes would not be offered at the proposed campus, given the relatively low enrollment in such classes currently, particularly for afternoon classes. Therefore, since the future class schedule at the proposed campus would be similar to the existing class schedule, the estimated 9% PM peak usage that was based on the existing campus was appropriate. The information in the Needs Assessment Study was not used to predict peak period usage because the students' "desire" for additional afternoon and evening classes would not actually occur at the new campus.

Response 9-45

While the vehicle trips generated by the project would generate exhaust emissions, these emissions would not be at a level that would be considered a significant air quality impact. The Bay Area Air Quality Management District's (BAAQMD) CEQA guidelines have a significance criteria of 2,000 daily vehicle trips for projects. Projects generating over 2,000 daily vehicle trips are assumed to exceed the BAAQMD's significance threshold of 80 pounds per day of Reactive Organic Gases (ROG), nitrous oxide (NO_X), and particulate matter less than 10 microns in diameter (PM_{10}). As discussed on p. A.29 of DEIR Appendix A, Initial Study, the project would generate about 900, or less than 2,000, auto trips per day. Therefore, the total increase in trips associated with the project would have a less-than-significant air quality impact, and the small portion of these trips associated with vehicles affected by the parking shortfall would have an even smaller impact than the project would as a whole.

As stated on pp. 80-82 of Section III.D, Transportation, of the DEIR, the total trips associated with the project would have little or no change on the LOS of intersections. Intersections in the vicinity currently operate at LOS B and would continue to do so with the project. Because the total trips associated with the project would not create a substantial difference in LOS, the trips associated with the parking shortfall would not be expected to alter the LOS conditions or air quality effects.

For additional information regarding the project's effects on air quality, refer to Appendix A, Notice of Preparation (NOP)/Initial Study, p. A.29.

Response 9-46

The Needs Assessment Study, performed by Beverly Prior Architects, was prepared before the District identified a specific site for future development of a consolidated campus. The intent of the Needs Assessment Study was to provide guidelines to assist the District in identifying a potential site, building, space, and funding needs.

The parking estimates identified in the Needs Assessment Study are based on a standard formula (1 car per 330 assignable square feet for student population) used for community college facilities in typical urban settings. If the standard formula were used, the resulting parking demand numbers would most likely be overestimated, because they would not reflect the project's accessibility to public transit, which ultimately results in lower auto usage. Such standard formulas should not be used if actual data are available, as in the case of the proposed project. There are a total of 12 Muni transit bus lines within a two-block radius of the project, and on Market Street (about seven blocks away from the project site), there is Muni Metro service and regional BART service. Since the student parking demand estimated in the DEIR (200 spaces) was based on actual data for the existing student population (e.g., mode of transportation and place of residence), that estimate is more reliable and accurate than the parking demand estimates in the Needs Assessment Study.

It should also be noted that the student data used included all satellite site locations, not just the main campus at 940 Filbert Street. See also Response 9-42 regarding the transportation analysis methodology.

Response 9-47

Of the 325 walk/bicycle person-trips identified in Table 3 (p. 81 of the DEIR), approximately 98% (or 320) would be walk trips and the remaining 2% (or 5) would be bicycle trips, based on surveys conducted by the District's Office of Research and Planning Department at all Chinatown/North Beach satellite site locations. Although bicycle usage at the proposed campus is projected to be fairly low, there would be bicycle parking spaces provided. These spaces would be located in the proposed garage, not on the sidewalk (see p. 82 of the DEIR). As such, there would be no impacts on pedestrian circulation. Although the number of bicycle spaces is yet to be determined, it is anticipated that about five would be provided, given the low bicycle demand. These spaces could easily be accommodated within the garage without having to reduce the number of parking spaces.

Response 9-48

The differences in information presented in the DEIR and the 1996 SEIR are due to differences in analysis methodologies. Specifically, transit impacts in the 1996 SEIR were evaluated based on the aggregated total number of bus trips provided by five of the more congested bus lines that had stops within two blocks of the project site. The analysis spread all of the transit trips from that project among the 84 buses serving the five lines selected for analysis. A line-by-line analysis was not used. This is one approach to providing an analysis of transit impacts, although it is not commonly used in San Francisco EIRs. The method used for the Chinatown/North Beach Campus DEIR involves an analysis of impacts on a screenline basis, rather than an aggregate of nearby bus lines. (Page 84 of the DEIR explains the concept of screenlines.) In addition, the capacity utilizations identified in the DEIR were based on Muni monitoring data which, unlike the 1996 SEIR, reflect an appreciable standee capacity, as requested by Muni staff. As such, the overall transit capacity under the screenline methodology would be higher, which would result in lower capacity utilization percentages than those assumed in the 1996 SEIR.

The information contained in both the 1996 SEIR and 1987 FEIR is not inconsistent with the information presented in the 1998 DEIR. Although the overall capacity utilization is approximately 70% crossing all four screenlines (p. 85 of the DEIR), a specific transit line within the system of screenlines could be operating with little excess capacity, as stated in the 1996 SEIR. Also, see Response 12-18.

For clarification, the last sentence at the bottom of p. 84 of the DEIR and the first partial paragraph at the top of p. 85 have been changed as follows:

> **Capacity utilization varies from about 50% for the northeast screenline to 73% for the northwest and southwest screenlines. Capacity utilization for all screenlines is 70%. Thus, the screenlines have capacity to accommodate additional passengers.**

The second to the last sentence in the first full paragraph on p. 85 has been changed as follows:

> **The proposed project would increase ridership by 218 transit riders on the outbound screenline with the greatest increase on the northwest screenline (the other screenline would receive a smaller contribution of riders).**

In addition, corrections are noted in the first sentence of the last paragraph on DEIR p. 84. The following changes have been made:

> **A total of ~~14,061~~ 14,269 Muni passengers leave the transportation study area ~~daily~~ during the peak hour.**

The above changes do not change the conclusions of the EIR.

Response 9-49

The statement on p. 75 of the DEIR was provided as part of a qualitative discussion about the general characteristics of on-street parking in the area. The sentence on p. 75 of the DEIR states that "most" of the on-street spaces have one-hour and two-hour limits, not "all." As such, the statement is correct.

Response 9-50

The transportation study referenced on p. 77 of the DEIR is the background transportation study that was conducted for the DEIR as described in the first paragraph on p. 71 in Section III.D, Transportation. Pedestrian impacts were evaluated at all crosswalks at the intersections of Columbus Avenue/Montgomery Street/Washington Street and Kearny Street/Washington Street. The intersection of Columbus Avenue/Montgomery Street/Washington Street is adjacent to the project and the Transamerica Pyramid. The pedestrian volumes collected at this intersection during the weekday PM peak hour included pedestrians traveling between the Financial District and the proposed project. Based on the number of pedestrians that were counted, the results of the analysis indicated that all crosswalks at this intersection are currently operating at LOS B or better conditions.

For clarification, the fourth sentence in the first full paragraph on p. 77 of the DEIR has been changed as follows:

> **Based on the transportation study, all ~~study~~ crosswalks at the intersections of Columbus Avenue/Montgomery/Washington Streets and Kearny/Washington Streets currently operate at LOS B or better conditions during the weekday PM peak hour, which indicates that pedestrians are generally crossing under free flow conditions, with little conflict with other pedestrians.**

The text revision is for clarification purposes and does not change the conclusion of the EIR.

Response 9-51

The DEIR analyzes the proposed project as a new use added to existing conditions on the project site and vicinity. That analysis covers effects of adding the projected population of 6,630 students at the project site. To the extent that transportation conditions in the vicinity reflect existing travel to and from satellite sites, the DEIR campus conservatively adds all trips to that base case. Thus, the analysis may in fact double-count some existing and new travel.

Because the satellite sites are dispersed throughout Chinatown and North Beach, that double-counting near the project site would be expected to be minor. In addition, when City College activities vacate existing satellite sites, other activities with similar traffic characteristics would likely move into these sites. Thus, the DEIR appropriately analyzes full development of the proposed project at the new site.

Bicycle usage at the proposed campus is expected to be fairly low, based on data on existing modes of transportation. It is estimated that there would only be approximately five bicycle trips during the PM peak hour. Bicycle access to the proposed campus is provided by several designated bicycle routes (Class III-signs only) in the area, i.e., Battery Street, Sansome Street, Columbus Avenue, and Broadway. Also refer to Response 9-47 regarding bicycle demand.

Response 9-52

The Initial Study, Appendix A of the DEIR, pp. A.25-A.27, discusses shadow and wind effects of the proposed project. The computer simulation cited on p. A.26 found that proposed development of Lots 4, 5, and 12 would not create shadows that would reach Portsmouth Square. Because of the St. Mary's project location to the north of the District site and of Portsmouth Square, that approved project would not affect potential project shadow conditions on Portsmouth Square.

The discussion on p. A.26, first paragraph, discusses potential project wind effects, separately from consideration of the St. Mary's site:

> "The proposed project would not have the potential to cause adverse wind accelerations in pedestrian areas adjacent to the site. The building site is not exposed greatly to prevailing winds. The proposed building would be sheltered from the wind by an existing structure to the west. Only the top story of the new building would extend into the wind, and any wind accelerations caused by the project's west face would be elevated well above street level."

Paragraph two, p. A.27, does consider planned development of Site A as a factor that would further reduce adverse wind conditions on the project site. On the basis of this information, the Initial Study appropriately concludes that the proposed project would not have significant shadow or wind effects, and no further analysis of those topics was provided in the DEIR.

Response 9-53

Please see Response 13-3 regarding the Treasure Island mitigation.

Response 9-54

The housing mitigation measure involves the District's participation in the Treasure Island Consortium which would renovate existing housing at the former Treasure Island Naval Station for potential use by up to 50 City College faculty and/or students. The use of such available housing is not expected to result in significant environmental impacts since the anticipated level of occupancy at the Naval Station would be substantially less than that under full occupancy by the Navy. In addition, separate environmental review of the impacts from reuse of Treasure Island is currently underway at the Planning Department. Also, the traffic generated by future reuse of Treasure Island is accounted for in the Year 2015 projections included in the transportation analysis in the DEIR, pp. 88-90. Further, any impacts are speculative at this time because, as discussed in Response 13-3, the feasibility of the Treasure Island Consortium is uncertain.

Response 9-55

Proposed mitigation measures under CEQA must "minimize," but not necessarily eliminate the significant effects of a project (Pub.Res.Code §21100(b)(3)). On p. 68, the DEIR proposes documentation as a mitigation measure to minimize the unavoidable significant impact of demolition. As noted in the DEIR, this measure is similar to the Condition of Approval imposed on the previous Kearny Street/Columbus Avenue project. Recognizing that the impact of demolition is significant regardless of any mitigation measures, the DEIR identifies and evaluates several alternatives, starting on p. 113, that would preserve the Colombo Building. The commenter has not proposed any additional feasible mitigation measures.

Response 9-56

Please refer to Response 9-16 for a discussion of the evaluation of the Fong Building.

Response 9-57

The text of the DEIR at the top of p. 109 has been revised as follows:

> **These additional mitigation measures would be implemented by the District and ~~might~~ would likely include a program of on-site monitoring of all site excavation, during which the archaeologist would record observations in a permanent log.**

As stated on p. 108 of the DEIR, after carrying out a pre-excavation testing program and submitting a written report of findings to the District, the archeologist and the District would determine jointly what additional procedures, such as an on-site monitoring program, would be necessary to minimize potential effects on archeological resources. The DEIR provides for other mitigation measures with regard to cultural resources, on pp. 108-110. The Section 106 Programmatic Agreement is currently being negotiated and is in draft form.

Response 9-58

CEQA does not require that the EIR contain full statements of the Guidelines sections applicable to a particular EIR section. The DEIR appropriately summarizes the applicable section in the introduction to the Alternatives Chapter (DEIR p. 113), and references the reader to CEQA Guidelines Section 15126.

Response 9-59

Please see Response 3-5 for discussion of the preservation scenario presented by the Chelsea Development Company.

Response 9-60

Please see Response 3-5 for discussion of the preservation scenario presented by the Chelsea Development Company. The preservation alternative discussed in the DEIR is set forth on pp. 119-120.

Response 9-61

The site at Broadway and Battery Streets is owned by the City, and the City has indicated that it is planning to create new housing on the site. The property is not for sale and is thus not available to the District for purchase. In contrast, while there is an existing housing use on Lot 12 of the project site, that property is available for sale via a private transaction. The following change to the last sentence of the second paragraph on p. 122 has been made for clarification:

> **The site is expected to be designated for housing, and thus is not available for purchase by the District./3/**

Response 9-62

DEIR pp. 120-123 discuss alternative sites considered. Among those sites were Lots 6 and 7 on the project block:

> "As an alternative to the acquisition and use of the Fong parcel (Lot 12), acquisition of Lots 6 and 7 was considered for development with Lots 4 and 5. The property is not on the market, but the owners appear willing to consider an offer. However, developing these two parcels would increase the chance of a new shadow on Portsmouth Square because the lots are west of Lots 4 and 5. Significant new shadows on Portsmouth Square is considered unacceptable."

Note that potential acquisition of Lots 6 and 7 was for development with Lots 4 and 5, or an alternative to use of Lot 12. This alternative would include reuse of the Colombo Building site. The District did not pursue this alternative because the properties were not formally on the market and development of Lots 6 and 7 to meet the District programs would likely cause new shadow on Portsmouth Square; addition of Lots 6 and 7 would not add enough site area to avoid demolition of the Colombo Building. See Figure 2, Project Location, DEIR p. 23, for identification of Lots 6 and 7.

Response 9-63

The DEIR includes cumulative analysis where appropriate. Cumulative development analysis of relevance to the topics analyzed in the DEIR is included in the document as noted on the bottom of p. 35 and top of p. 36. Site A at Kearny and Jackson Streets, known as the St. Mary's project, is discussed on p. 42, Section III.A, Land Use and Zoning, and p. 56, Section III.B, Aesthetics, and is shown on Figures 15B and 18B. Section III.C, Historical and Architectural Resources, discusses site-specific effects of the project and nearby historic districts. Section III.E, Geology and Soils, and Section III.F, Hazards and Hazardous Materials, are essentially site-specific issues.

(In some copies of the DEIR, Figures 15B and 18B were printed with the incorrect name for the Site A project. Figures 15 and 18 (revised to Figure number 18-1), reproduced on the next two pages, have been corrected to show the correct labeling of Site A as the St. Mary's Project. This correction does not change the conclusions of the DEIR). Traffic impacts for the year 2015, including those from the proposed-project-plus-cumulative-development traffic, are discussed on pp. 88-90 of the DEIR. Those year 2015 traffic conditions account for growth in downtown San Francisco, including development of Site A.

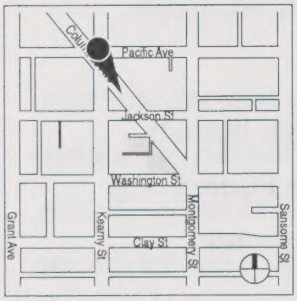
Having analyzed cumulative impacts where relevant, the DEIR did not identify any significant cumulative impacts.

Response 9-64

The project site's specific location and position with respect to existing historic districts, including the Chinatown and Jackson Square Historic Districts, are shown in Figure B.1 in Appendix B. Please see Response 9-66 below regarding incorporation by reference.

Response 9-65

Conforming with CEQA Guidelines section 15087(c)(5), the documents referenced in the DEIR were collected by the environmental consultant and made available to the public during the public review period at 33 Gough Street, the administrative offices for the District. These documents were available during the District's normal working hours. The District is unaware of any instance in which a member of the public was unable to review the documents. There may have been a few instances in which the Letter 9 commenters sought documents and, because the commenters were plaintiffs in CEQA litigation against the District, District staff was unsure whether disclosure of documents would be appropriate. It is the District's understanding that the Letter 9 commenters were able to review documents, after clarification was given to District staff.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Pacific Ave
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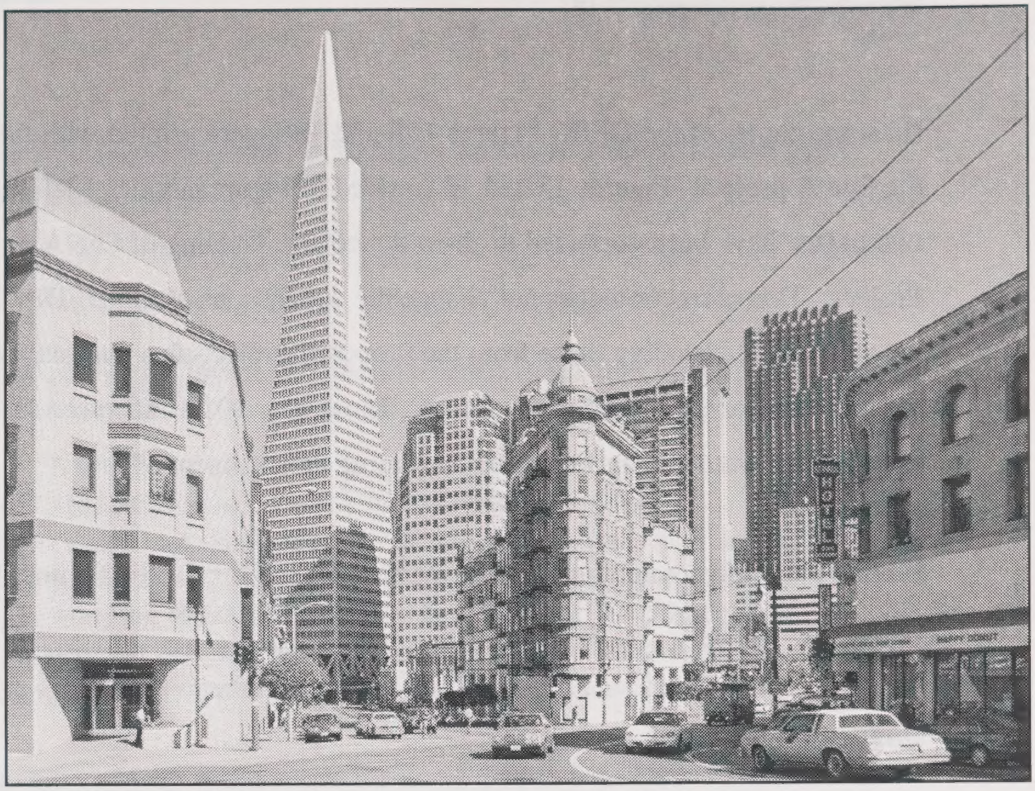
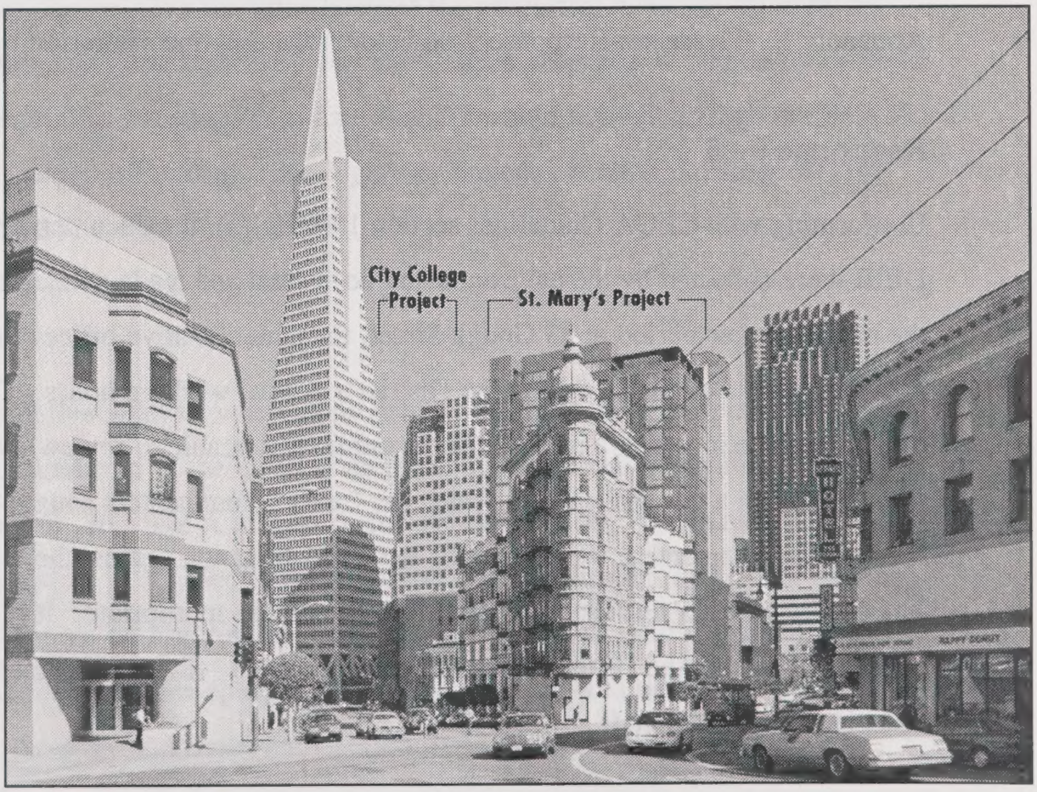
Sansome St



A — Project Site

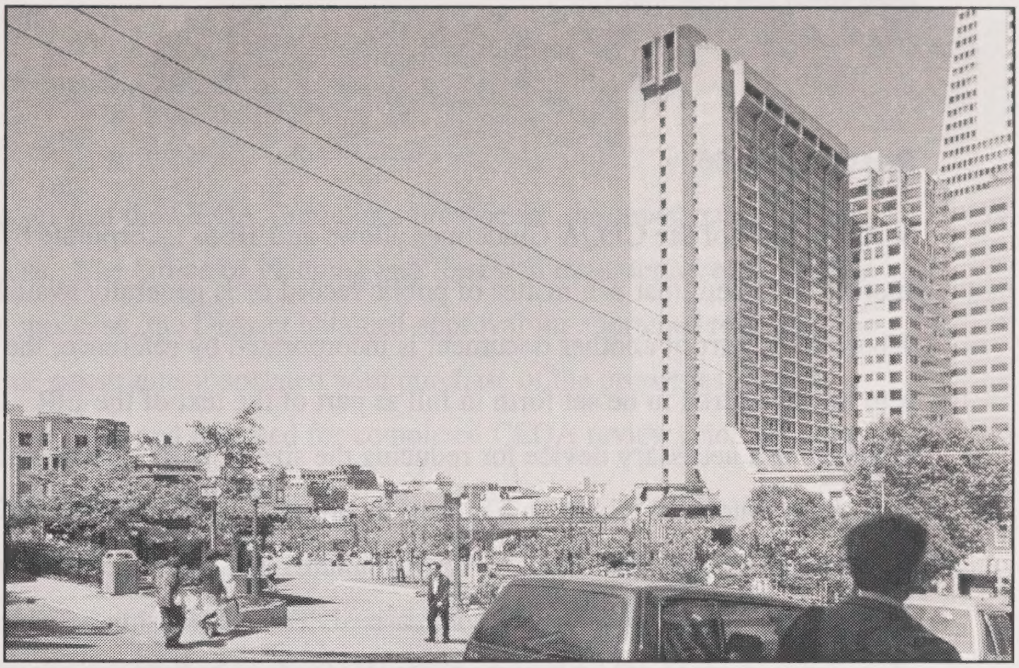

City College Project
St. Mary's Project

B — Proposed Project

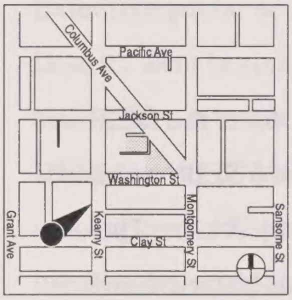
Source: Square One Productions

EIP ASSOCIATES

Views from Columbus Avenue at Kearny Street Figure 15 (revised)



A — Project Site, near the southwest corner of Portsmouth Square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Pacific Ave
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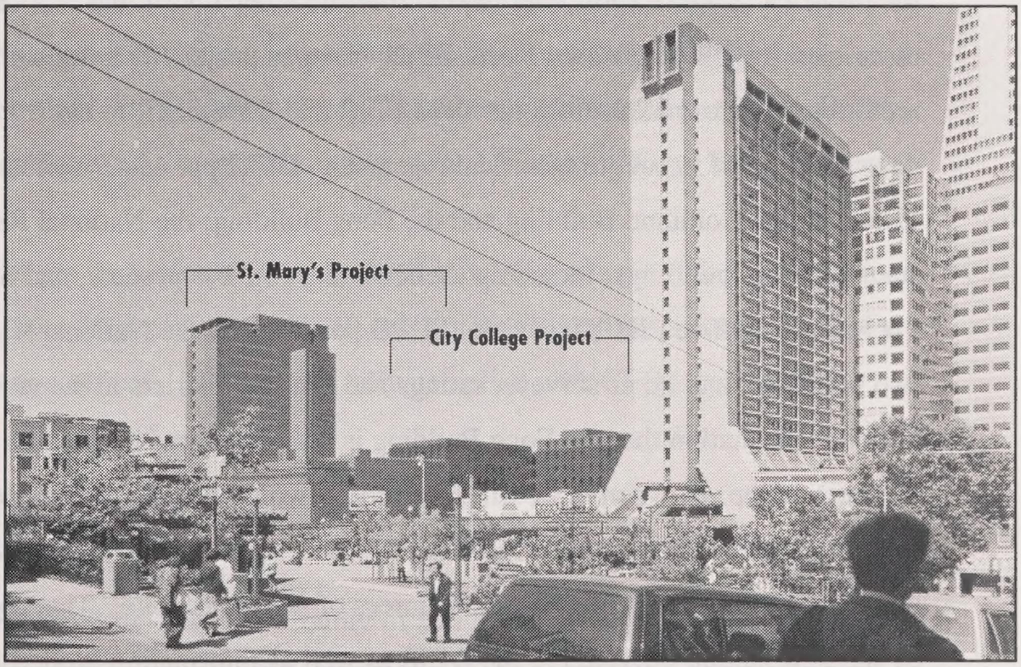
Washington St
Montgomery St
Kearny St
Clay St
Grant Ave
Sansome St


St. Mary's Project
City College Project

B — Proposed Project, near the southwest corner of Portsmouth Square

Source: Square One Productions

Views from Clay Street at Walter U. Lum Place Figure 18-1 (revised)

Response 9-66

Section 15150 of the CEQA Guidelines allows an EIR to incorporate by reference portions of another document that is a matter of public record or is generally available to the public. Where all or part of another document is incorporated by reference, the incorporated language is to be considered to be set forth in full as part of the text of the EIR. Incorporation by reference is a necessary device for reducing the size of EIRs. Section 15150 (c) of the CEQA Guidelines states that where an EIR uses incorporation by reference, the incorporated part of the referenced document "shall be briefly summarized where possible or briefly described if the data or information cannot be summarized. The relationship between the incorporated part of the referenced document and the EIR shall be described."

The DEIR properly implements incorporation by reference. As stated on p. 62 of the DEIR in Section III.C, Historical and Architectural Resources, the 1987 FEIR and 1996 SEIR evaluated the historical, architectural, and cultural resources for Lots 4 and 5 of the project site. The discussion for the Chinatown/North Beach Campus project includes sufficient historical and architectural information from the 1987 FEIR and 1996 SEIR to assist in making a determination of impact to historical resources. DEIR pp. 62-69 discuss the architecture and history of the Colombo Building and the Fong Building; the National Register status (or lack of status) of both buildings, including the HUD Section 106 process, and State Historic Preservation Office (SHPO) review; SHPO positions on the National Register eligibility of the two buildings; and other surveys, ratings and historic districts in the vicinity. The DEIR also cites documentation that the Fong Building is not considered eligible for the National Register. As noted on pp. 67-68 of the DEIR, the project would demolish the Colombo Building, found to be eligible for listing on the National Register, which would cause a significant and unavoidable impact on the historic resources of the project site. That conclusion is supported by the information provided in the DEIR as well as information properly incorporated by reference.

Response 9-67

The comment properly notes that the CEQA Guidelines provide for shortened public review under certain circumstances. The Office of Planning and Research must approve any request for shortened review. In this case, the District obtained approval for shortened review of the DEIR based on severe time constraints associated with purchase of the properties, such as approaching close of escrow dates and the need for completed CEQA review prior to obtaining bond proceeds for the purchase from the City.

Response 9-68

Extensive public notice of the availability of the DEIR was provided by the District. The District went beyond the notice requirements set forth in CEQA, by publishing the notice of availability in a newspaper of general circulation (The Independent), mailing copies of the DEIR to over 50 interested individuals, public agencies, and community organizations, and sending over 400 notices of availability to organizations, individuals in the community, and owners and occupants in the project vicinity. Copies of the DEIR were available at the District's administrative offices, at two public library branches in Chinatown and North Beach, the main public library, and the main campus building of the Chinatown/North Beach Campus.

The District is unaware of any individuals who requested in writing a copy of the DEIR and did not receive a copy. Over 70 copies of the DEIR were picked up by members of the public at the District administrative offices. The District fully complied with CEQA notification requirements.

Response 9-69

As pointed out in Response 9-8, the City and County of San Francisco is a responsible agency. It appears from the comment that a meeting of the Landmarks Preservation Advisory Board was scheduled during the 30-day review period, and thus the Board had an opportunity to review the EIR, take public comment and prepare comments to the District.

The following pages from Page & Turnbull, Inc., *Kearny Street/Columbus Avenue Project, Section 106, NHPA: Supporting Information*, December 20, 1996, pp. 54-58, 72-73, and 76-77, have been added to DEIR Appendix B.

III. Description of Affected Historic Properties

The degree to which properties within the "Zone of Influence" would be affected by the project's demolition of the Colombo Building and construction of new use structures varied from the immediate effect on adjacent buildings to the broader scope of adjacent districts. The following describes the affected buildings and districts, their characteristics and relationship to the block on which the Colombo Building sits.

The Colombo Building and Its Site

The Colombo Building is a two-story composition displaying engaged Ionic pilasters or columns at street level on the Columbus Avenue elevation. These are surmounted by a classical (Ionic) entablature; the second story is treated as an attic above the entablature, and has its own less elaborate (Tuscan) cornice. The once-open rotunda, provided at the gore corner, has been enclosed. Of particular interest is that on the Washington Street elevation, the bulk of the building advances to the property line and engaged pilasters are not used except for one at the east end, which terminates the rotunda. Simple piers separate the storefronts on this elevation: a clear indication that the architects thought it secondary.

The basic building material is concrete, ornamented with cast stone or cement plaster, which have been painted a number of times. Green marble appears on piers a the base of columns or pilasters. While change has occurred in most of the lower level shops, certain storefronts appear to be original, and certain interior fittings may date from the date of construction or the decade immediately following. Upper level windows are one-over-one wood sash, the lower half of which project as awning units; the curved windows above the rotunda also are one-over-one awning units which are quite unusual. Six of the upper level windows have been replaced with modern aluminum sash.

The critical relationship of the effected block and its surroundings is apparent in the relationship between the Colombo Building and the Fugazi Bank/Old Transamerica Building on the opposing corner. The matching pair introduce the beginning of Columbus Avenue from the downtown area by demonstrating the unusual axis of the avenue in the design of each gore corner. The rounded corner signals transition and a change in axis while the scale of the buildings represents that of the area and the cohesion of historic districts. The cohesion of the Colombo building to the Old Transamerica Building seems to bind it to the Jackson Square Historic District.

A sufficient amount of the fabric of the building still remains so that the Colombo Building retains architectural integrity. On the basis of the prominence of its architects; its urban design significance at the inception of Columbus Avenue; its noteworthy and prominent owner; and its condition, the Colombo Building has been proposed, in June of 1984, by the Landmarks Preservation Advisory Board (LPAB) to be a Landmark of the City of San Francisco. The nomination was never acted upon by the City Planning Commission or the Board of Supervisors. Another case report, completed in 1996, was heard and adopted by the LPAB in November of 1996. These case reports are included in this section.

The Former International Hotel Site

The former site of the International Hotel (Site A of the proposed project) has been the location of political controversy since 1979, when the Hotel, a single-room occupancy facility serving low-income tenants, was demolished, initially to provide a site for continued downtown office development. In addition, the site stands physically at the crossing of a number of patterns of development: the Jackson Square Historic District to the east; Chinatown to the west; North Beach to the north; and downtown development to the south.

Site A extends on Kearny Street between the intersection of Kearny and Jackson and a point approximately 180 feet to the south; the Jackson Street frontage is about 110 feet, and takes up most of the block front between Kearny-Jackson and Lot 14. Of the two frontages, that on Kearny Street is the more important, because the block is trapezoidal in plan, and a triangular portion of Block 176 stands immediately to the north, upon which have been built 900 and 916 Kearny Street (Columbus Tower) which dominate views of the Jackson Street frontage from northerly angles of view. { Section II, Figure 5; Section III, Photograph 17 }

The proper role of any development on such a site should be to reflect the scale, character, and quality of surrounding zones. In this case, to reflect such differing zones and scales is a difficult task for the designer. Effect of the introduction of the subject project into this site is discussed in Section IV.

Properties Adjacent to Projects Sites A & B

The structures other than those properties which the project directly effects are the six buildings on the trapezoidal block that date from the same post-1906 earthquake development of the Colombo Building. These buildings are somewhat less significant than the Colombo Building but their frontage on Columbus Avenue, Washington Street, and Jackson Street give them prominence at the entrance of such an integral passage from downtown and toward the North Beach area. Architecturally, most of these buildings are variations of the Classical Revival style but the scale is consistently maintained at two- to three- stories with a division of the first story and the upper levels by a distinct cornice or entablature line. Historic Resources Inventory forms have been included, in this section, with descriptive text and more detailed information on each of the five buildings, of which only one had previously been completed, 57-67 Columbus Avenue.

Jackson Square Historic District

Jackson Square is a designated landmark and National Register of Historic Places district, in which the oldest commercial buildings exist from the 1850's and 1860's. Although these buildings have been adapted for new use, it is apparent that their existence has regulated the type of development in the area and the scale to which it is built. The District stands as an example of pre-1906 earthquake architecture dating from the days of the Gold Rush. The buildings maintain a modest scale, mostly under forty feet and their detailing, fenestration, and materials have a continuity that unifies the district. The Classical detailing of the buildings is characteristic of mid-nineteenth century commercial storefronts. The relationship of Jackson Square to the Colombo Building block is bound by the spine of Columbus Avenue, on which both face and contribute to. It is obvious that the buildings in the area have taken their lead from Jackson Square just as the Colombo Building took its direction in design from the Old Transamerica Building.

Proposed Chinatown Historic District

West of the Colombo Building block, is the proposed Chinatown Historic District. Chinatown is a less unified zone than the Jackson Square District, and it is characterized by buildings built within the first two decades after the 1906 earthquake-fire with a several modern interventions and structures that have occurred since 1906. Identified by Chinese or Chinese-American ownership and use, Chinatown displays intense and small-scale mercantile, industrial and residential activity. Many buildings in this district were built in the Classical Revival style and reflect, in their detailing, the Asian origins of the majority of its inhabitants and its commercial atmosphere. A Chinatown Historic District has been considered by the Landmarks Preservation Advisory Board, based on a proposal by Patrick McGrew, President of the Board, and sent to the City Planning Commission in September, 1985, the proposed boundaries of which are indicated on Figure 5 (Section II). Research supporting Mr. McGrew's proposal is contained in *North Beach San Francisco: An Architectural, Historical and Cultural Survey*, by Anne Bloomfield, Daniel Warner and Nancy Olmsted, 1982. The proposed district has not been adopted.

Since the buildings on the project site facing the Chinatown area have since been demolished, there currently does not seem to be a direct relationship between the two. Unlike those on the project block and in Jackson Square, many buildings in Chinatown rise above the three-story level and are not confined to a common scale. Thus, the link between the districts and the project site are the Classical style and detailing.

Portsmouth Square

Portsmouth Square represents the earliest beginnings of the City, though its present character dates mainly from the late 1960s, when a parking garage was placed beneath the Square and a bridge connecting it to the Chinese Cultural Center in the Holiday Inn was built, located on Block 208.

Downtown San Francisco

Finally, the northernmost edge of downtown development is indicated on blocks 208 and 207, across Washington Street from the project site, with Holiday Inn; Montgomery-Washington office-residential tower; and the Transamerica Pyramid marking the present boundary of large-scale development.

State of California — The Resources Agency
DEPARTMENT OF PARKS AND RECREATION

PRIMARY RECORD

Primary #
HRI #
Trinomial
NRHP Status Code 3D
Other Listings
Review Code Reviewer Date

Page 1 of 2

*Resource Name or #: (Assigned by recorder) John G. Ils Hotel

P1. Other Identifier:

*P2. Location: ☐ Not for Publication ☒ Unrestricted *a. County City & County of San Francisco

and (P2b and P2c or P2d. Attach a Location Map as necessary.)

*b. USGS 7.5' Quad N3745-W12222.5/7.5 Date 1973 T 1S ; R 5W ; ¼ of ¼ of Sec ; B.M.

c. Address 53-55 Columbus Avenue City San Francisco Zip 94111

d. UTM: (Give more than one for large and/or linear resources) Zone ; mE/ mN

e. Other Locational Data: (e.g., parcel #, directions to resource, elevation, etc., as appropriate)

Assessor's Block 195/Lot No. 12

*P3a. Description: (Describe resource and its major elements. Include design, materials, condition, alterations, size, setting, and boundaries)

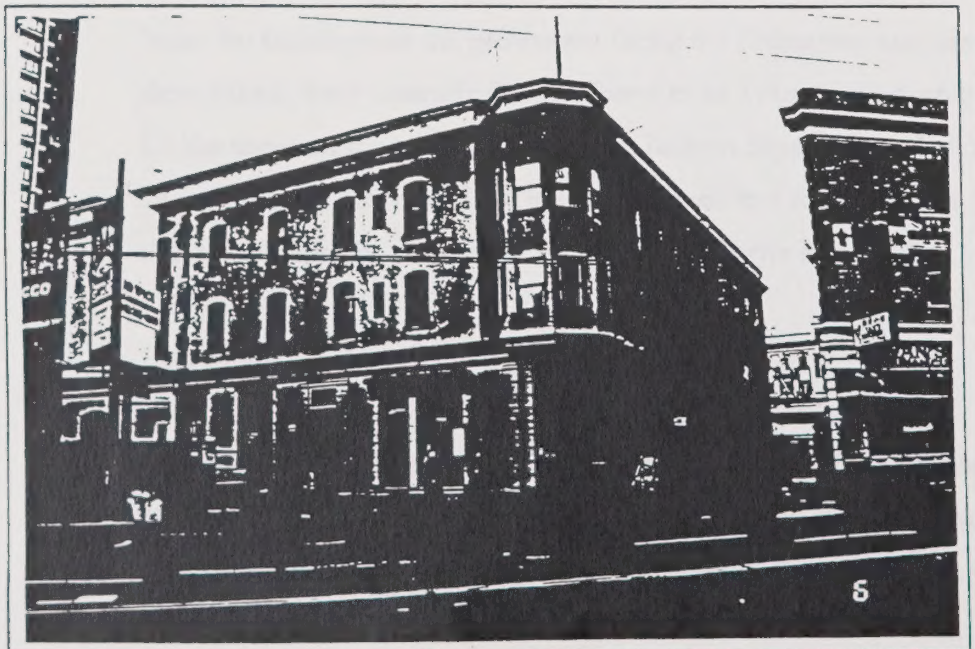
This 1910 building sits at the crossing of two minor streets and Columbus Avenue, expressing this meeting with an octagonal corner. The three-story building has a commercial function but is also a large residential complex. The corner piece projects beyond the first floor flattened corner and the second and third levels are separated by decorative panels. The building is divided horizontally by the first level entablature and the cornice that tops the third level, a typical characteristic of the buildings in the area. Above this cornice rises a parapet finished with a simple cornice treatment. The double-hung windows of the projecting octagonal corner, on the upper levels, are rectangular in contrast to the segmental arch openings of the inset double-hung windows on the rest of the building. The inset doors have wooden surrounds and some openings are surmounted by a galvanized iron lintel. The corner storefront has two transom windows that meet at the corner. On the first level, brick pilasters divide the building into irregular bays.

The building was constructed with brick and finished with stucco. The cornices are made of galvanized iron.

The corner of the building projects onto the street edge and the entire building covers an area of about 75' x 106'.

*P3b. Resource Attributes: (List attributes and codes) HP3. Multiple Family Property
HP6. 1-3 story commercial building

*P4. Resources Present: ☒ Building ☐ Structure ☐ Object ☐ Site ☐ District ☐ Element of District ☐ Other (Isolates, etc.)



P5b. Description of Photo: (View, date, accession #) 11/02/96
Roll 1/Frame 7
NE corner from Columbus Av

*P6. Date Constructed/Age and Sources: ☒ Historic ☐ Prehistoric ☐ Both
1910, factual
Water Dept.

*P7. Owner and Address:
Fong NY Enterprise of Cal,I
55 Columbus Ave
San Francisco, CA 94111

*P8. Recorded by: (Name, affiliation, and address)
J. Gordon Turnbull
Page & Turnbull, Inc.
San Francisco, CA 94108

*P9. Date Recorded: 11/96

*P10. Survey Type: (Describe)
Supplemental EIR (Draft)
Kearny St./Columbus Ave.
Project

*P11. Report Citation: (Cite survey report and other sources, or enter "none.") City & County of San Francisco, 12/12/96
Kearny St./Columbus Ave. Project: Supplemental EIR

*Attachments: NONE ☒ Location Map ☐ Sketch Map ☐ Continuation Sheet ☒ Building, Structure, and Object Record ☐ Archaeological Record ☐ District Record ☐ Linear Feature Record ☐ Milling Station Record ☐ Rock Art Record ☐ Artifact Record ☐ Photograph Record ☐ Other (List)

State of California — The Resources Agency
DEPARTMENT OF PARKS AND RECREATION

Primary #

HRI#

BUILDING, STRUCTURE, AND OBJECT RECORD

Page 2 of 2

*NRHP Status Code 3D

*Resource Name or # (Assigned by recorder) John G. Ils Hotel

B1. Historic Name: John G. Ils Hotel

B2. Common Name: John G. Ils Apartments

B3. Original Use: Hotel B4. Present Use: Apartments, Office space

*B5. Architectural Style: Classical Revival with unique octagonal corner piece

*B6. Construction History: (Construction date, alterations, and date of alterations)

Constructed: 1910
Remodeled: 1939, alterations unknown

*B7. Moved? ☒No ☐Yes ☐Unknown Date: Original Location:

*B8. Related Features:

NONE

B9a. Architect: Fabre and Mohr b. Builder: Unknown

*B10. Significance: Theme Architecture Area San Francisco

Period of Significance post-1906 earthquake Property Type Residential/Commer. Applicable Criteria C

(Discuss importance in terms of historical or architectural context as defined by theme, period, and geographic scope. Also address integrity.)

The building was constructed after the 1906 earthquake during a time of great urban renewal. The Classical Revival style of the building is not atypical for the area, but its unusual site allows the corner to face onto Columbus Avenue. Although the octagonal corner is matched by other corner buildings in the area, the building is unique in that most of the facade does not front on Columbus Avenue as other facades do. The pilasters on the first level are irregularly spaced and their brick banding gives the building texture. The banding of the cornice above the first level and another above the third is a common feature of the area.

Integrity-
A sufficient amount of the building's fabric still remains so that the building retains architectural integrity. Only minor damage is discernible at street level.

B11. Additional Resource Attributes: (List attributes and codes) HP3. Multiple Family Property
HP6. 1-3 story commercial building

*B12. References:

San Francisco Downtown Inventory
Foundation for San Francisco's Architectural Heritage-Research & Field Survey Forms

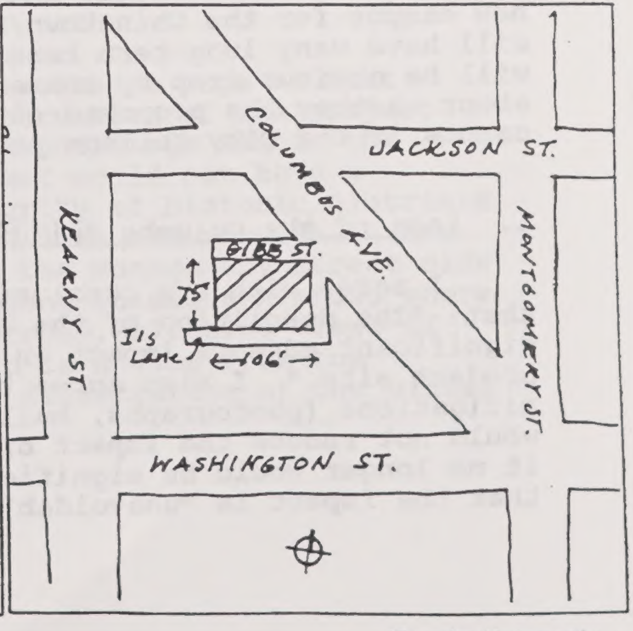
B13. Remarks:

Zoning: CRNC
Threats: None known

*B14. Evaluator: J. Gordon Turnbull

*Date of Evaluation: 11/96

(This space reserved for official comments.)



DPR 523B (1/95)

*Required Information

10

LANDMARKS PRESERVATION ADVISORY BOARD

1660 MISSION STREET, 5TH FLOOR, SAN FRANCISCO, CA 94103-2414
TEL. (415) 558-6345 • FAX. (415) 558-6409

May 22, 1998

Peter A. Goldstein
Chief Operating Officer
City College of San Francisco
33 Gough Street
San Francisco, CA 94103

RE: **State Clearing House No. 98031039**
Comments on Draft Environmental Impact Report for the City College of San Francisco Chinatown/North Beach Campus

Dear Mr. Goldstein:

At our regular meeting of the San Francisco Landmarks Preservation Advisory Board on Wednesday, May 20, 1998, we did not have a sufficient quorum to jointly consider the Draft Environmental Impact Report for the proposed City College Chinatown/North Beach Campus and assemble official comments of the Landmarks Board, so these comments are my own, although I draw upon my experience as a member and current President of the Landmarks Board in making them.

I appreciate this opportunity to review and comment on this document for an important and significant public project, since a new campus for the Chinatown/North Beach area of San Francisco will have many long-term benefits for the community, although as will be obvious from my comments below, I have serious questions about whether the proposed site is the right place for the new campus if the City College proceeds with the proposed project.

1. Loss of the Columbo Building as an Historic Resource.

I agree with the conclusion on pp. 67 and 68 of the DEIR that: "The demolition of the Columbo Building would cause a significant adverse impact on the historic resources of the project site." I also agree that the project sponsor's proposed mitigations (photographs, building descriptions, and HABS study) would not reduce the impact of the demolition to the point that it no longer would be significantly adverse, but I do not agree that the impact is "unavoidable" (p. 68). As will be discussed 1

1 more fully below, the Columbo Building can be preserved in a revised alternative to the proposed project.

2 2. Loss of the Fong Building as an Historic Resource.

I strongly disagree with the statement on page 69 that "the demolition of the Fong Building would not cause the loss of an individually historically or architecturally significant structure, and this would not be considered a significant environmental effect." The Fong Building, built in 1910 (prior to the Columbo Building), qualifies by age for historic significance, and the building in the Classical Revival style with some decorative elements makes a positive architectural contribution to the area. The fact that it is not formally listed as specially distinctive does not mean that it lacks historic or architectural merit; there are many historically and architecturally valuable buildings in San Francisco which do not appear in the official lists.

3 3. Cumulative Effects of Demolitions.

The demolitions of the Columbo Building and the Fong Building should not be seen in isolation from each other but should be considered cumulatively. Two low rise buildings dating from before World War I which are placed at the entry block to Chinatown/North Beach on Columbus Avenue would be eliminated and replaced with a modern and massive institutional-type building, completely changing the profile of this significant transitional block.

4 4. Effects on Historic Districts.

I strongly disagree with the statements on page 69 that
"demolition of those buildings and construction of the project
would have no direct physical effect on buildings within the
historic districts" and that "The project would not have a
substantial adverse impact on the integrity of historic districts
5 or other adjacent resources." The DEIR does not provide a view
of the Project from the south, as from the Montgomery Street side
of the Transamerica Building looking along Columbus Avenue, where
the project would loom up in the foreground, blocking views of
the buildings beyond. Figure 16, which is a view from the
opposite direction, is an insufficient illustration of the visual

impacts of the project on its surroundings. The Columbo Building and the original Transamerica Building provide the perceived gateway entry statement to Chinatown/North Beach on Columbus Avenue; and one half of the gateway would be obliterated by the proposed project. 5

Further, the proposed tall and massive institutional-type building will be out of character with the low rise Jackson Square Historic District across Columbus Avenue. Handbooks issued by the Secretary of the Interior to illustrate inappropriate structures near historic districts show tall and massive modern buildings looming over historic resources such as the Vieux Carrie in New Orleans and Lincoln's home. 6

The Chinatown District means more than some architecturally distinctive historic buildings. Part of the historic value of Chinatown lies in the many hotels and apartment buildings which have provided shelter for many years at affordable rates to low income persons, including elderly and single person households. The destruction of the Fong Building will subtract a long-standing housing resource from the community which has been providing affordable housing for nearly 90 years. 7

5. Affordable Housing Considerations.

In 1996, the San Francisco Landmarks Board considered another effort to have the Columbo Building declared a local Landmark, and on a close and controversial vote decided not to recommend landmark status in order to support the City's interest in achieving new affordable housing units at the former International Hotel site which was tied to the Columbo Building site by the same owner of both properties. The current project addressed in the DEIR involves the loss of 21 units of affordable housing which would result from the demolition of the Fong Building. This significant adverse impact cannot be mitigated by helping the displaced residents to relocate, since San Francisco would suffer a net loss of affordable housing units, and the relocated persons would simply displace others scrambling for the short supply of affordable units in the City. In addition, the residents of the Fong Building are part of Chinatown, and if they were forced to move out of the community, they would be deprived of convenient access to the familiar sources of services and goods as well as suffering the disruption of community-based ties with families and friends. The only appropriate mitigation would be for the project sponsors to provide 21 new units of housing in 8

8 the Chinatown area without destroying some off-site historic resources.

6. Preservation Alternatives.

9 In addition to Alternative C, the EIR should consider and analyze the impacts of a taller building on Lots 4 and 5 which would retain the Columbo Building. Preservation Alternative C adds only one story to the Columbo Building. Such an alternative would allow the City College to achieve more of its objectives and not so easily reject a preservation alternative.

7. Conclusion.

I respectfully suggest to the City College Board that they should take a "hard look" at the significant adverse impacts their proposed project would have on historic resources and on the affordable housing stock of the City and either select a Preservation Alternative or look elsewhere for the site of their desired new campus for Chinatown/North Beach.

I would appreciate a copy of the Response to Comments.

Sincerely,

Daniel F. Reidy

DANIEL F. REIDY

cc: Members of the Landmarks Board
Marcia Rosen, San Francisco Mayor's Office of Housing
Gerald Green, Director, San Francisco Planning Department
The Foundation for San Francisco's Architectural Heritage
Friends of the Columbo Building

Letter 10: Daniel F. Reidy

Response 10-1

Please refer to Response 10-9 below regarding the commenter's preservation scheme.

Response 10-2

Please refer to Response 9-16 regarding the historical value of the Fong Building.

Response 10-3

Please see Response 9-38 regarding the North Beach gateway.

Response 10-4

Please refer to Responses 9-12 and 9-14 regarding demolition effects on historic districts.

Response 10-5

See Response 9-38 regarding the North Beach gateway and photographs of the Colombo Building. Please refer also to Response 9-17 regarding photographs of the Fong Building.

Response 10-6

Please see Response 9-38 regarding urban design concerns related to the North Beach gateway, and Response 9-14 regarding the relationship of the Colombo and Fong buildings to the Jackson Square Historic District.

Response 10-7

This comment correctly notes that the Chinatown area provides affordable housing for many individuals and that destruction of the Fong Building would result in the loss of housing. See Responses 13-1 and 13-2 regarding the DEIR's discussion of the loss of housing associated with the project.

Response 10-8

Please see Response 10-7 regarding housing impacts and Response 13-3 regarding replacement housing to mitigate the loss of residential units associated with the project.

Response 10-9

Alternative C, DEIR pp. 119-120, reviews a Preservation Alternative that would retain the Colombo Building, and would add one floor covering 75% of the Colombo Building's footprint. As noted on p. 120, "this would avoid the significant impact of demolishing the Colombo Building, which would occur with the project as proposed." Alternative C would have about 119,000 gross square feet (gsf), compared to 158,000 gsf with the project.

The commenter identifies a preservation alternative in which the Columbus and Washington street facades of the Colombo building were preserved and the remaining portions of the building would be demolished. In this alternative, the existing facade would be restored and new construction would be added occupying about 75% of the site footprint of the Colombo Building. The new, higher portion of the building would be set back 10-12 ft. from the façade to provide a transition between the old façade and the new structure. This alternative, assuming eight floors of new construction on the Colombo Building site and Lot 5 and seven floors on Lot 12 would yield approximately 190,000 gsf of space.

The programmatic arrangement on the lower floors of this alternative would remain essentially the same as the Preservation Alternative, Alternative C, that adds only one floor above the Colombo building. The Colombo building façade would be used for street level entrances to retail space, the bookstore, and senior center. The second floor behind Colombo building façade would be used for student services and administration areas. Floors three through eight, which would step back from the façade, would house classrooms, faculty and staff offices, library, and childcare spaces. Lot 12 (the Fong Building site) would be developed as in Alternative C.

This alternative would retain Colombo building façades and the program space would be maximized within a preservation scheme. Compared to the proposed project, the floor plates above the Colombo building would be less efficient by stepping them back behind the façade. As a preservation alternative, the commenters approach would result in a visual relationship between the retained two-story facade of the Colombo Building surmounted by six stories of new construction. This design would, to some extent, be a matter of judgement, but it could be considered to be an inappropriate treatment of the older elements of the building, compared to Preservation Alternative C.

11

THE TELEGRAPH HILL DWELLERS

P.O. Box 330159 San Francisco, CA 94133

May 23, 1998
via facsimile (415/241-2344)

Peter A. Goldstein
Chief Operating Officer
City College of San Francisco
33 Gough Street
San Francisco, California 94103

RE: City College of San Francisco Chinatown/North Beach Campus
Draft Environmental Impact Report - Clearinghouse No. 989031039

Dear Mr. Goldstein:

The following are the comments of the Telegraph Hill Dwellers with regard to the above-mentioned Draft Environmental Impact Report (DEIR) prepared for the San Francisco Community College District's (District) proposed purchase and development of a new Chinatown/North Beach Campus at 1-55 Columbus Avenue (Block 195, Lots 4, 5 and 12).

We are extremely concerned that this DEIR cannot be used as an effective tool by the public or by the public officials considering this project because of its over-reliance on other documents which are only incorporated by reference. In other words, the DEIR has the effect of obfuscating the project description, project setting and the project's environmental impacts by referring the reader to other documents and not sufficiently summarizing these documents in the DEIR. By way of one example, the DEIR does not even include a photograph of the National Register eligible, State-listed, Colombo Building which this project would demolish. Not only does the DEIR improperly rely on other documents, these other documents themselves do not contain sufficient information and analysis. 1

There is insufficient basis in the DEIR for the findings made as to traffic impacts, impacts on aesthetics, impacts on shadows and wind, and impacts on historic buildings and districts (other than the Colombo Building). The proposed project would clearly have impacts on the Jackson Square Historic District which are not in any way addressed or considered in the DEIR. Further historic research and analysis of the Fong Building and the historic "gateway" into North Beach must be included in order to make this a sufficient document. 2

3 The DEIR does not explain why the City of San Francisco (City) is not the lead agency or, at a minimum, a responsible agency. The City has already approved a development for this site -- a Planned Unit Development (PUD) composed of this site and the International Hotel site. Future actions required by the City would include but not be limited to: (1) approving an amended PUD and certifying a Supplemental EIR in connection with the amended PUD; (2) approving the bonds for the purchase of the District's site; and (3) entering into a Section 106 agreement pursuant to the National Historic Preservation Act pertaining to the entire PUD. Please explain why the City is not the lead agency or at least a responsible agency. On what basis was this decision made?

4 The DEIR does not explain how the District can exempt itself from all of the General Plan provisions, zoning ordinances, planning code provisions, and PUD conditions and requirements. Does California Government Code Section 53094 allow the College to exempt itself from each of these government plans, provisions, conditions and requirements as to the District's site? What kind of findings will the District have to make? Given the fact that the project proposes to include such non-classroom facilities as a senior center, a restaurant and administrative facilities can the District exempt itself from local zoning ordinances using Government Code Section 53094?

The District's plan to exempt itself from the City's zoning provisions seems to be used throughout the DEIR as a questionable justification for not fully describing the project and analyzing its environmental impacts.

5 Given the magnitude of the inadequacies of the DEIR we recommend that a revised draft document be circulated for review and comment.

Thank you for considering and responding to our comments

Sincerely,

Gerry Crowley

Gerry Crowley
President

Letter 11: Gerry Crowley, President, The Telegraph Hill Dwellers

Response 11-1

Please see Response 9-66 regarding incorporation by reference.

Photomontages of the proposed project that illustrate the proposed structure with surrounding buildings are provided on Figures 15B through 18B of the DEIR, pp. 58-61. The Colombo Building may be seen in the bottom center of the top photograph on Figure 16, DEIR p. 59. See Response 9-38 for photographs of the Colombo Building.

Response 11-2

See Responses 9-18 and 9-22 regarding historic districts and gateways. Traffic and transportation impacts are discussed on pp. 80-90 of the DEIR. Shadow and wind studies were conducted for the project site. This subject is discussed in Appendix A of the DEIR, pp. A.25-A.27. Please also see Response 9-52.

The Fong Building, which has been determined not to be eligible for the National Register, is discussed on p. 69 of the DEIR in Section III.C, Historical and Architectural Resources. See also Response 9-16.

Response 11-3

Please see Response 9-8.

Response 11-4

Please see Response 9-31 for a discussion of exemption from local zoning ordinances.

The District may exempt itself from local zoning ordinances unless the proposed facilities constitute "nonclassroom facilities" under Government Code section 53094. Because the components of the proposed building, including the classrooms, labs, administrative offices, parking, childcare, senior center, and potential student-run restaurant, all serve an important educational purpose and are directly related to the District's unique educational function, these components are not "nonclassroom facilities", and the statutory exemption would be applicable.

Response 11-5

Recirculation does not appear to be warranted, based on evidence and information obtained to date. Recirculation is required when significant new information is added to the EIR after publication of the DEIR but before certification of the Final EIR (CEQA Guidelines section 15088.5). No new significant information has been added to this EIR by way of public comment or by the District's initiative that deprives the public of a meaningful opportunity to comment on a new significant environmental impact, or a feasible, effective mitigation measure or alternative that the District refuses to adopt.

12

LANDELS
RIPLEY &
DIAMOND
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Tel 415 512 8700
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May 22, 1998

HAND DELIVERY AND CERTIFIED MAIL

Peter A. Goldstein
Chief Operating Officer
City College of San Francisco
33 Gough Street
San Francisco, CA 94103

Re: Comments to City College of San Francisco ("CCSF") Chinatown/North Beach Campus Draft Environmental Impact Report; State Clearinghouse No. 98031039

Dear Mr. Goldstein:

We represent Montgomery-Washington LP ("Montgomery-Washington LP"), the owner of the Montgomery-Washington Tower located at 655 Montgomery Street, San Francisco, California. This letter presents Montgomery-Washington LP substantial concerns about the above referenced draft environmental impact report ("DEIR") failure to comply with some of the most critical requirements of the California Environmental Quality Act ("CEQA") and the proposed 158,000 gross square foot campus facility ("Project") for the CCSF Chinatown/North Beach Campus. Montgomery-Washington LP is concerned that the DEIR seriously understates the impacts of the Project and fails to offer adequate evaluation of alternatives to the Project.

Please note that we have delivered our comments before May 23, 1998 the stated date for the EIR comment period to end. CEQA, however, requires a forty-five (45) day public review period whenever an EIR is submitted to the State Clearinghouse for review (Public Resource Code §21091(a)); 14 Cal. Code Regs. §15105(c), 15106 and 15205(d).) 1

The letter begins with a series of fundamental comments and concerns which apply generally to the DEIR, and then continues to set forth a number of more specific comments regarding particular aspects of the DEIR.

A. **General Comments.**

2 1. The Project is Inconsistent with the Master Plan of the City and County of San Francisco ("Master Plan"). The Project is inconsistent with the Master Plan and cannot be approved without an amendment to the Master Plan. The Master Plan policies related to housing and the Chinatown Area Plan Residence Element provide that the policy of the City of San Francisco ("City") is to "stabilize and where possible increase the supply of housing." Policy 1 of Objective 3 calls for the community to conserve existing housing in Chinatown. (DEIR, p. 43) The policies regarding housing with respect to Chinatown are echoed by the general housing policies of the Residence Element of the Master Plan. Objective 3 states that the existing supply of housing should be retained; Policy 1 of the Objective that "discourage the demolition of existing housing." (DEIR, p. 43) The Project includes the demolition of the Fong Building and the loss of 21 units of residential housing in Chinatown. Clearly the Project is inconsistent with the Master Plan.

3 The DEIR describes a "No Housing Displacement Alternative" which would provide 65% of the program space planned for the Project and spare the Fong Building from demolition. As a result, the 21 housing units would remain available to residents of Chinatown. Although DEIR states that CCSF's willingness to participate in the renovation of existing housing at the former Treasure Island Naval Station is a "mitigation" for the loss of residential housing units to low-income residents of Chinatown, it is a charade to claim that providing housing for 50 faculty and foreign students on Treasure Island provides any mitigation for the people who will be displaced from their homes in the Fong Building. (DEIR, p. 110) Further, the participation by CCSF in the Treasure Island housing proposal does not serve as a mitigation directed toward achieving consistency with the Master Plan because the Master Plan calls for conserving housing in Chinatown.

4 The Project is inconsistent with the City's Master Plan policy to protect Architectural Resources. The Project would demolish the Colombo Building which is eligible for listing on the National Register of Historic Places. (DEIR, p.4) As pointed out in the DEIR, "the demolition of the Colombo Building would mean the loss of an historic structure and would cause a significant adverse impact on the historic resources of the project site." (DEIR, p.4) The Colombo Building could be preserved if CCSF elected to proceed with Alternative C to the Project, the Preservation Alternative. If CCSF chose Alternative C, it would be able to provide 75% of the facilities which would be included in the Project without demolishing one of the City's architectural resources. (DEIR, p.14) Because Alternative B and Alternative C provide environmentally superior alternatives to the Project, the DEIR must provide additional evaluation of those alternatives.

The DEIR states that the Fong Building contributes to the historical character of
Chinatown (DEIR, p. 69), but concludes that because the Chinatown Area Plan does not find the
Fong Building to be architecturally significant, its demolition would not cause the loss of an
individually historically or architecturally significant structure. (DEIR, p. 69) This conclusion is 5
not consistent with Public Resources Code §21084.1 which provides that the fact that a resource
is not listed in the local register of historical resources or listed in the California Register of
Historical Resources shall not preclude a lead agency from determining whether a resource may
be a historical resource. Further, the DEIR errs by not considering that the demolition of the
Fong Building and the Colombo Building when considered together shall have a cumulative 6
significant effect because the Project will necessitate the loss of two buildings which make a
contribution to the historic character of Chinatown.

2. The Project is Incompatible with the Project Vicinity. The Project calls for too
intense a use in an already congested area. The 158,000 gross square foot Project will be located
in what is already one of the most intensely congested and heavily traveled areas of the City.
The Project exceeds the scope of facilities that are necessitated by the current substandard
facilities of the CCSF. According to the DEIR, the June 1997 Needs Assessment Study and
Schematic Building Program prepared by CCSF identifies a need of 98,999 assignable square 7
feet to serve the existing and future needs of the campus. (DEIR, p. 17) Two alternatives to the
Project analyzed in the DEIR will satisfy the majority of the needs of the CCSF for a
Chinatown/North Beach Campus and not so severely add to the vehicular and pedestrian
congestion that already plague the Project vicinity.

3. The Project is Inconsistent with the City's Zoning Ordinances. In addition to
being inconsistent with fundamental policies of the City's Master Plan, the Project is inconsistent
with the City's zoning ordinances. Demolition of residential apartments is a non-permitted use.
The Project exceeds the bulk requirements of the 65-D-2 Height and Bulk District. (DEIR, p. 8
51) Exceptions to the size restrictions applicable to institutional uses in the CRNC and CCB
Districts would have to be obtained (DEIR, p. 51) by variance or conditional use permit.
Further, setbacks of 35 feet for new construction are required in the Project area to facilitate
access of sunlight to sidewalks. (DEIR, p. 51).

The DEIR states that CCSF may elect, pursuant to Government Code Section 53094 and
a 2/3 vote of its Board of Trustees, to find the City's zoning codes inapplicable to the Project.
However, Government Code §53094 applies only to facilities used for or related to student 9
instruction. Any use other than classroom facilities, i.e. administrative uses, parking, childcare
facilities, must be subject to the City's zoning ordinances. Therefore, the Project must be
evaluated in terms of its consistency with existing zoning ordinances.

10 Appendix G of the CEQA Guidelines provides that a Project may be deemed to have a significant effect on the environment if it conflicts with adopted environmental plans and goals of the community where it is located. (Appendix G, ¶(a)) The potential exemption of a portion of the Project from local zoning ordinances does not apply for significance purposes in determining if there is a land use incompatibility. Because the Project is incompatible with critical policies of the Master Plan and provisions of local zoning ordinances it should be deemed to have a significant effect on the environment.

11 4. The DEIR Fails to Properly Incorporate by Reference other Documents. The CEQA Guidelines provide that where an environmental impact report is incorporated by reference, the incorporated portions of the referenced document shall be briefly summarized or described (CEQA Guidelines §15150). The DEIR bases its future cumulative traffic volumes and street network on information contained in the Alternatives to Replacement of the Embarcadero Freeway and the Terminal Separator Structure 1996, and incorporate this document by reference. Because the DEIR fails to restate the critical technical information from this incorporated document, the reader is not adequately informed of the base information upon

12 which critical conclusions are made. For example, the DEIR states in a conclusory fashion that cumulative pedestrian-volume conditions in the Project vicinity are not likely to reach or exceed LOS D (DEIR, p. 90). However, there is no information on what the existing pedestrian counts are and how "LOS" is determined for this impact.

B. **Specific Comments**.

13 The purpose of an EIR is to provide an accurate good faith evaluation of a proposed project, its potentially significant impacts, and mitigation measures and alternatives to avoid those impacts. Rather than making conclusory statements about environmental issues, an EIR should describe "empirical or experimental data, scientific authorities, or explanatory information" to support its conclusions about environmental impacts. People v. County of Kern, 39 Cal.App.3d 830, 841-842 (1974). Also, a legally adequate EIR "must contain sufficient detail to help insure the integrity of the process of decision-making by precluding stubborn problems or serious criticism from being swept under the rug." Kings County Farm Bureau v. City of Hanford, 221 Cal.App.3d 692, 733 (1990).

This DEIR is not legally adequate because it consistently underestimates the environmental impacts and cumulative impacts of the Project rather than providing the required good faith, accurate disclosure of environmental problems. The DEIR basically looks at the Project through rose-colored glasses, minimizing many environmental problems by making conclusory, unsupported statements that impacts will not be significant. Public Resources Code §21001.1 provides that a public agency is not exempt from the requirements of CEQA. CCSF should be held to the same standards as a private developer and provide adequate information to adequately access the significant environmental impacts of the Project. 13

The following are specific examples of the DEIR's failure to provide adequate analysis of Project impacts:

1. Trip Generation. The DEIR analysis and methodology of trip generation is fatally flawed and presents a skewed picture of the impact of the Project at peak a.m. and p.m. periods. Using the conservative 10% growth factor included in the DEIR, the population of students and faculty at the Chinatown/North Beach campus is projected to be almost 7,000 students as of 2020. The DEIR is internally inconsistent when it notes that trip generation for the Project was obtained from an on-site survey at the existing main campus on Filbert which counted only 9% of the total daily trips occur during peak p.m. hours. It is implausible that 9% of the trips occur at the p.m. peak when 30% of the students attend late afternoon or evening classes. If 30% of the students arrive (or depart) the Project at the p.m. peak (assuming that 75% of the students and faculty will attend the campus on a daily basis as projected in the DEIR) then 3,150 trips will occur during the p.m. peak hours. The DEIR makes the statement that 855 person-trips would occur during the weekday p.m. peak hour. (DEIR, p. 79) 14

2. Mode of Transportation. There is no analysis whether the consolidation of the facilities into the Project will cause any change in attendance patterns or the method of transport by students and faculty to the Project. 15

3. Impact of Parking Deficit. Anyone who has walked down Montgomery Street or
Washington Street during the either the a.m. or p.m. peak will testify to the difficulty of finding
available parking either on the street, surface lots or in underground garages. The statement in
the DEIR that "parking deficits are an inconvenience to drivers, but not significant physical
impact on the environment" is in error (DEIR, p. 83). A parking deficit caused by a project is an 16
impact that must be mitigated (Laurel Heights Improvement Assn. v. Regents of Univ. of
California, (1988) 47 Cal.3d 376, 418.) There is a physical impact caused by increased air
pollution caused by cars searching for parking. The DEIR estimates that there will be a shortfall
of 105 parking spaces. This added vehicular congestion to already overcrowded arterials will be
a disincentive to visiting the Chinatown area for business or tourist purposes. The DEIR is
internally inconsistent in its analysis of the extent of the parking shortfall. At one point the
DEIR refers to a peak parking demand for 220 parking spaces, however, the parking demand in 17
the Needs Assessment Study (based on 98,000 asf) was for 350 spaces. (DEIR, p. 17, p. 83)

4. Impact on Muni. The DEIR is inconsistent in its analysis of the impact of the Project on Muni. The DEIR states that the Project would add 428 transit trips. (DEIR, p. 85) 18 Yet, the DEIR also states that 90% of the students and 40% of the faculty either ride Muni or

18 find an alternative to the automobile to travel to the existing campus. (DEIR, p. 5) There is no analysis of whether or why existing patterns of transportation on Muni will continue. The DEIR concludes that the addition of 428 transit trips would increase the overall Muni system capacity utilization from 70% to 71%. (DEIR, p. 85) First, the DEIR should be able to identify which line or lines will be impacted by the majority of riders and state the impact on that line, not the understated impact of 428 transit trips on the entire Muni system.

19 5. The Traffic Analysis Understates the LOS at Critical Intersections. Traffic impacts of the cumulative-with-project conditions are based on the presence of mitigations identified as necessary in a prior environmental study, Alternatives to Replacement of the Embarcadero Freeway and the Terminal Separator Structure FEIR Study, dated August 1996. It is not clear whether these mitigations have been funded or if a schedule for construction is in place. An accurate analysis of traffic impacts of the cumulative-with-project conditions would be without the mitigations of a second exclusive northbound left-turn lane on The Embarcadero and a second, eastbound, through lane on Washington Street being in place. (DEIR, p89)

20 6. Pedestrian Trips. Although the Project will bring almost 7,000 students to the Montgomery/Washington area, the DEIR asserts "the proposed project would generate 750 pedestrian trips during the p.m. peak hour". (DEIR, p. 85) How does the analysis account for the fact that 30% of the students and faculty attend or teach late afternoon or evening classes? Assuming that 75% of the 7,000 student body visits the campus on any particular day; and 30% of that number attend late afternoon or evening classes, there will be 3,150 pedestrian trips affecting the sidewalks in the Project vicinity. The impact of these increased pedestrian trips must be analyzed for the DEIR to be legally adequate.

21 7. Inadequate Analysis of Visual Impact on Neighborhood. The DEIR's analysis of the visual impacts of the Project is legally inadequate because it does not include the most important visual impacts and because the analysis downplays the actual significance of visual impacts rather than providing good faith accurate disclosure. It is impossible to visualize from the pictures included in the DEIR how the mass and bulk of the Project will impact the existing streetscape.

C. **Conclusions**.

22 Based on the foregoing, it is clear that CCSF has economically feasible alternatives to the Project which will provide the majority of benefits sought without loss of both a valued architectural resource or destruction of low-income housing in Chinatown. One of the most fundamental provisions of CEQA is the statutory policy that a public agency shall not approve a project as proposed if there are feasible alternatives to the Project or feasible mitigation measures which would reduce or avoid the Project's significant environmental impacts. This policy is

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implemented by the requirement that the DEIR evaluate a reasonable range of project alternatives which avoid environmental harm while still fulfilling the basic objectives of the Project (Cal. Pub. Res. Code §21002).

California Public Resources Code Section 21100(b)(2)(A) provides that if impacts cannot be alleviated without requiring an alternative project design, the environmental impact report must describe their implications and the reasons the project is being considered despite their affects. (See also 14 Cal. Code of Regulations 15126(b)). Although the DEIR does state the impacts that cannot be alleviated without approving an alternative to the Project, the DEIR provides no explanation as to why the Project is being considered even though there will be loss of residential housing in Chinatown and the loss of one of the City's architectural resources. 22

We appreciate the opportunity to comment on this DEIR. Our comments raise substantial and significant environmental CEQA compliance issues. We look forward to CCSF's response.

Very truly yours,

Deborah M Castles

Deborah M. Castles

Michael H. Zischke

Letter 12: Deborah M. Castles, Attorney at Law, and Michael H. Zischke, Attorney at Law, Landels, Ripley & Diamond

Response 12-1

The District obtained approval for a shortened 30-day review period from the Office of Planning and Research, as allowed by CEQA Guidelines section 15105 and Appendix L. The approved shortened public review period was noted in the public notice on the availability of the DEIR as well as in the Notice of Completion.

Response 12-2

The EIR acknowledges that the project is inconsistent with policies in the City General Plan relating to housing, including General Plan policies. Please see Response 13-2. Please see Response 13-3 regarding additional mitigation to provide replacement housing in the Chinatown/North Beach area, which thereby ensures project consistency with many of the City's housing policies.

Response 12-3

Please see Response 13-3 regarding participation in the renovation of existing housing at Treasure Island.

Response 12-4

This comment summarizes conclusions in the DEIR about the significant adverse impact caused by demolition of the Colombo Building. The DEIR provides appropriate detail in presenting Alternatives B and C, as set forth in DEIR pp. 117-120.

Response 12-5

Please refer to Response 9-16 regarding evaluation of the Fong Building as a historic resource.

Response 12-6

Cumulative impacts need be discussed in an EIR only when they are significant, as noted in CEQA Guidelines Section 15130. Cumulative impacts on historic resources are not discussed in the DEIR because they are not significant. The demolition of the Colombo Building, eligible for listing on the National Register, together with the demolition of the Fong Building, a building that is not historically significant, would not cause a cumulative significant adverse impact on historic or architectural resources. As discussed in Response 9-14, the Fong Building and other buildings on the site are not eligible for the National Register, nor constitute an historic district. Therefore the DEIR found that demolition of the two buildings would not have a cumulative effect on architectural resources.

Response 12-7

For a description of the traffic and pedestrian impacts of the proposed project, see DEIR pp. 71-91. The project description section of the DEIR, on pp. 16-34, sets out the project objectives and explains the need for 158,000 gross square feet to meet projected program requirements. The comparison made by the commenter between 158,000 gross square feet and the 98,000 assignable square feet identified in the Needs Assessment Study is not appropriate. The comparison should be between the assignable square feet for the proposed project (i.e., 101,000) and the assignable square feet in the Needs Assessment Study (i.e., 98,000).

Response 12-8

The District agrees that demolition of residential apartments is a non-permitted use, and that this would cause a significant and unavoidable adverse impact. For discussion of the project's inconsistency with bulk, height, and other design requirements in the zoning ordinances, please see Response 9-6.

Response 12-9

Please see Response 11-4.

Response 12-10

As discussed at length in the DEIR, the demolition of the Colombo Building and the Fong Building is inconsistent with General Plan policies and applicable zoning ordinances, and is considered a significant unavoidable impact in each case. See DEIR pp. 47-51 and 67-68. For a discussion of the project's consistency with the General Plan, please see Responses 9-28 and 9-33. For a discussion of consistency with zoning ordinances (other than those related to housing issues), see Response 9-6.

Response 12-11

Response 9-66, above, discusses incorporation by reference, as provided for in CEQA Guidelines Section 15150. This comment specifically requests clarification of base information incorporated by reference for transportation analysis.

DEIR p. 88, Section III.D, Transportation, states existing traffic volumes were adjusted based on a growth rate derived from information provided in the *Alternatives to Replacement of the Embarcadero Freeway and the Terminal Separator Structure* 1996 Final EIR. This information was used to prepare Table 5 on p. 89, Future (Year 2015) Cumulative + Project Weekday PM Peak Hour Intersection Level of Service. Further information contained in the reference 1996 document is described on DEIR pp. 88-89. The DEIR references and summarizes technical information from the incorporated document appropriately and provides the reader with a basis of the analysis.

Response 12-12

DEIR p. 77, Section III.D, Transportation, Setting, Pedestrian Conditions, presents a summary of pedestrian operations, and Level of Service characteristics. DEIR p. 85, Pedestrian Impacts, notes that project trips were assigned to all crosswalks analyzed, and were found to remain at an acceptable LOS B, or free-flow conditions. DEIR p. 90, as cited in the comment, provides additional discussion of potential cumulative pedestrian effects.

The background transportation study conducted for the DEIR provides information on existing pedestrian counts and how LOS is determined. Thus, the DEIR provides sufficient information on existing conditions, analysis methods, and conclusions of effects. Please also refer to Response 9-50.

Response 12-13

The comment assets that the DEIR underestimates environmental impacts and makes unsupported statements that impacts would not be significant. The comments that follow raise specific examples of what are believed to be inadequate analysis. As discussed in Responses 12-14 through 12-21 below, conclusions in the DEIR are supported by appropriate data and methods of analysis.

Response 12-14

As stated on p. 21 of the DEIR, student enrollment by the year 2020 would be approximately 6,630, which would be 370 students less than the 7,000 stated in the comment. The transportation analysis conducted for the project was based on the 6,630-student projection.

Page 20 of the DEIR states that "about 30% of classes are offered during the evening between 6:30 and 9:00 PM." This statement refers to a percentage of classes, not students, as stated in the comment. Although about 30% of the classes are offered during the evening period, these classes have lower enrollments than some classes offered during the late morning period, for example./8/ Since 30% of the classes is not the same as 30% of the students, it would be inaccurate to apply this percentage to the total student enrollment to estimate evening enrollment.

As cited on DEIR p. 78, an on-site survey was conducted at the 940 Filbert Street main campus in order to estimate the percentage of people entering and exiting the building during

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8. Joanne Low, Dean-Chinatown/North Beach Campus, City College of San Francisco, telephone conversation with Korve Engineering, June 5, 1998.

the PM peak hour (generally between 5:00 and 6:00 PM). Based on a resulting 9% PM peak hour rate, it was estimated that there would be 855 person-trips. This percentage could not have been derived by only looking at student enrollment in the afternoon classes and student enrollment in the evening classes, since it would not have accounted for the fact that some students could have stayed in the building to take both a late afternoon class and an evening class.

Response 12-15

The mode of transportation for the proposed campus was based on a survey of all the existing campus locations. It was assumed that the mode of choice for students and faculty/staff of the new campus would not substantially change from that of the existing campus, based on the reasons described below.

Both the existing campus and satellite sites and proposed campus site have similar transit accessibility. Most of the existing sites are well served by public transit. For example, within a two-block radius, satellite sites 4 and 5 (see Figure 1 on p. 19 of the DEIR) are currently served by approximately 13 Muni transit lines, and satellite sites 6, 7, 8, and 9 are served by approximately 18 lines. As stated in the DEIR, the proposed campus would be served by 12 Muni transit lines. Since the level of transit accessibility at existing campus locations is similar to that at the proposed campus, the percentage of students and faculty/staff taking transit is not expected to change significantly.

Both the existing sites and proposed site have, or would have, no, or limited, on-site parking. The main campus currently provides some on-site parking for faculty and staff, but no on-site parking for students. At all other campus locations, no on-site parking is provided for either faculty/staff or students. The proposed campus would provide 114 on-site parking spaces, with priority given to faculty/staff. Although there is currently no parking provided for students, those driving would most likely park on the street. Depending on their place of residence, they may continue to drive to the proposed campus. Due to lack of availability of on-site parking at both the existing and proposed sites, the percentage of students and faculty/staff driving is not expected to be significantly different at the proposed campus.

The net change in the mode of choice is likely to be insignificant. Some students who currently live within walking distance of an existing site may choose to take transit to the proposed campus. Conversely, some students currently using transit (e.g., from Chinatown to the main campus) could live within walking distance of the proposed campus. Therefore, it is not unreasonable to assume the same mode splits between the two campuses.

Response 12-16

Please see Response 9-45, discussing air quality effects related to parking deficits.

Response 12-17

Please see Response 9-46, discussing parking demand.

Response 12-18

Please see Response 12-15 for a discussion of existing transportation patterns that are expected to continue at the proposed campus.

The DEIR is not inconsistent in its analysis of transit impacts on Muni. The 428 transit trips identified on p. 85 of the DEIR refers to weekday PM peak hour trips only. A substantial number of the 14,269 daily transit trips occur outside of the PM peak hour. Thus, the figure of 90% cited in the comment is not related to the number of additional PM peak hour transit trips that were assumed to result from the proposed project.

Due to the fact that the proposed project is a relocation and consolidation of existing sites within the Chinatown/North Beach area (as opposed to the construction of an additional campus), the transit analysis conducted for the DEIR represents a conservative scenario and may overestimate the number of new transit passengers. That is, some of the additional 428

PM peak hour transit trips estimated for the proposed project are already part of the existing daily transit ridership of 14,269 passengers (see p. 84 of the DEIR as revised by Response 9-48). For example, a student currently taking Muni Line 1 to attend classes at satellite sites 6 or 7 (see Figure 1 on p. 19 of the DEIR) would be included in the 14,269 existing daily passenger count. Since this particular student would continue to take Line 1 to get to the proposed campus, he/she would not be a new rider to this line. Similar situations could occur with other Muni lines.

It is not possible or appropriate, with a transit system like the one provided by the San Francisco Municipal Railway, to assign existing or potential new riders on a line-by-line basis. Instead, transit analyses are prepared on a corridor basis, using screenlines, as described on p. 84 of the DEIR. This is because in most areas of the City, and particularly in the Northeast and Northwest corridors, several Muni lines run parallel and close enough together that many riders choose to ride whichever line is most convenient and least crowded on a particular day. Thus, it is not possible to accurately assign individual travelers to individual bus lines within a corridor or subcorridor. This is unlike more suburban systems where a single line serves an area and all riders traveling to or from that area must use that single line. Thus, there could be students who currently take particular transit lines to an existing satellite site, but may prefer to take different lines in the same overall corridor to the proposed campus. In general, the redistribution of some of the estimated 428 transit trips could decrease ridership on some lines, while increasing ridership on others, but would not substantially change the effect on the corridors or at screenlines.

Response 12-19

The comment is correct in that cumulative traffic conditions for this study were based on the presence of mitigations identified in the *Alternatives to Replacement of the Embarcadero Freeway and the Terminal Separator Structure FEIR (Embarcadero FEIR)*. Of the many different mitigation measures identified in the Embarcadero FEIR, only those that would be implemented at the intersection of The Embarcadero/Washington Street are relevant in the CCSF Chinatown/North Beach study. This intersection is located within the Mid-

Embarcadero section of The Embarcadero roadway (between Broadway and Folsom Street), and roadway improvements along the Mid-Embarcadero are scheduled to begin in Summer 1998 and will take approximately one and a half years to complete. Since the cumulative analysis for the CCSF Chinatown/North Beach study was conducted for Year 2015 conditions, it was reasonable to assume the mitigation measures at The Embarcadero/Washington Street would be in place by then.

Response 12-20

Please see Response 12-14, discussing the analysis of 855 trips during the 5:00 PM to 6:00 PM peak hour, that would result in 750 pedestrian trips.

Response 12-21

DEIR p. 53-61, Section III.B, Aesthetics, describes the visual setting and project effects on the site and vicinity. That analysis and the accompanying figures describe visual effects from locations on Columbus Avenue, Washington Street, and Portsmouth Square. In addition, Responses 9-38 to 9-41 clarify the visual analysis information and conclusions, and add an additional existing view and simulation from Washington Street and Montgomery Street, looking north on Columbus.

The comment states that the analysis is inadequate and downplays the significance of visual impacts. However, the comments do not identify any specific viewpoint, visual effect or conclusion believed to be incomplete or inadequate. On the assumption that the commenter, representing the owners of the Montgomery-Washington Tower, directly south of the project site, is concerned about changes in views from that building, the following is noted. The eight-story project would block some views to the north of Telegraph Hill and the Bay from north-facing offices of the Montgomery-Washington Tower; above the fourth floor, however, existing views would not be notably altered. Such changes in views from private buildings are not considered significant adverse impacts.

Response 12-22

The DEIR provides a listing of the impacts that cannot be avoided or reduced to a less-than-significant level with mitigation measures, as required by CEQA and the CEQA Guidelines (see DEIR p. 126). The DEIR presents the District's reasons for considering the proposed project in Chapter II, Project Description, which begins on DEIR p. 16. If the District decides to approve the project as proposed, the District Board of Trustees would adopt a statement of overriding considerations setting forth its reasons for approving the project in the face of adverse unavoidable significant environmental impacts.

13

PLANNING DEPARTMENT

City and County of San Francisco 1660 Mission Street San Francisco, CA 94103-2414

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May 21, 1998

Peter A. Goldstein
Chief Operating Officer
City College of San Francisco
33 Gough Street
San Francisco, CA 94103

RE: City College Chinatown / North Beach Campus Draft Environmental Impact Report

Dear Mr. Goldstein:

The Planning Department has the following comments on the Draft Environmental Impact Report (DEIR) for the proposed City College Chinatown / North Beach Campus.

The proposed project would demolish 21 units of affordable housing in the Chinatown
neighborhood where residential demolition is prohibited according to the Planning Code CRNC 1
(Chinatown Residential Neighborhood Commercial) District controls. The San Francisco
General Plan discourages demolition of existing sound housing and encourages retention of 2
affordable housing.

The Housing Mitigation Measure does not directly address the loss of this affordable housing, such as providing relocation assistance for the residents whose dwelling units would be demolished. Instead, the proposed mitigation is to provide replacement housing on Treasure Island for City College students and faculty, and is not specifically targeted for students and faculty of the proposed Chinatown / North Beach campus. 3

We hope that our comments may help the College District's campus planning efforts in the Chinatown / North Beach area. If you have questions about our department's review of the DEIR, please contact Irene Nishimura of my staff at 558-6358.

Sincerely,

Gerald G. Green
Director of Planning

Letter 13: Gerald G. Green, Director of Planning, City and County of San Francisco Planning Department

Response 13-1

On pp. 43-44 and 50, the DEIR discusses the project's inconsistency with the City's Planning Code and acknowledges that as a result, the loss of 21 units of housing would be a significant impact.

Response 13-2

On pp. 42-43 and 47-48, the DEIR discusses the project's inconsistency with policies in the City's General Plan related to housing.

Response 13-3

The Treasure Island housing mitigation measure, by potentially providing housing for students and faculty who otherwise would likely seek housing in the Chinatown area, lessens the housing impact associated with construction of a Community College campus in Chinatown. As stated in the DEIR on p. 110, up to 50 units could be set aside for City College use. However, the EIR recognizes that such mitigation would not reduce housing impacts to an insignificant level. In addition, the feasibility of the Treasure Island Consortium is uncertain and has been put on hold pending the outcome of planning efforts for Treasure Island. The District Board of Trustees has already authorized City College of San Francisco's participation in the Treasure Island Consortium if and when the Consortium does go forward with the housing renovation.

In addition to the mitigation proposed in the DEIR, in order to further mitigate the housing impacts associated with the project, the following mitigation measures have been added to DEIR p. 111 after the first paragraph:

HG-2 Replacement Housing: The District would provide replacement housing in the Chinatown/North Beach area of San Francisco for the twenty-one (21)

units of housing currently in the Fong Building that would be removed as a result of the project. Potential mechanisms by which the District could implement this mitigation include, but are not limited to, the following:

(a) **Payment of funds to an agency or organization experienced in the development of housing for the construction of 21 units of housing in Chinatown/North Beach;**

(b) **Inclusion of 21 units of housing in the building constructed for the Chinatown/North Beach Campus Project; or**

(c) **Construction by the District of 21 units of housing in Chinatown/North Beach.**

The District would be responsible for securing financing for implementation of this mitigation measure. Because the District does not now know which of the proposed options it would pursue, the future environmental consequences, if any, of this mitigation measure are not yet known. Once the District determines how it would implement the mitigation measure, it would conduct any environmental review required by CEQA.

HG-3 **Relocation Assistance: In order to mitigate impacts associated with the displacement of tenants, the District would provide relocation assistance to all individuals and businesses displaced as a result of the project, pursuant to the California Relocation Assistance Act, California Government Code section 7260 et seq. Such assistance would include, among other things, help in locating replacement housing for displaced tenants, and financial assistance for displaced persons and businesses. The District has retained a relocation assistance consultant to assist in providing relocation assistance. The project will not be constructed for two to five years; thus approval of the project will not result in the immediate displacement of any tenants.**

While the mitigation measures for housing would reduce the housing impact, even with implementation of such measures, residential units would still be demolished and individuals displaced as a result of the project. Therefore, the loss of 21 residential units in the Fong Building remains a significant and unavoidable impact.

14

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May 20, 1998

Peter A. Goldstein
Chief Operating Officer
City College of San Francisco
33 Gough Street
San Francisco, CA 94103

RE: Draft Environmental Impact Report,
Chinatown/North Beach Campus
State Clearinghouse No. 98031039

Dear Mr. Goldstein:

I am writing on behalf of the Montgomery-Washington Tower Association ("the Association") to object to the adequacy and sufficiency of the above-referenced Draft Environmental Impact Report ("the EIR").

The Association is composed of the owners of the 33 residential condominium units located at 611 Washington Street. The members' residences occupy the top seven floors of the Montgomery-Washington Tower, 655 Montgomery Street. These homes are located across the street from the proposed Chinatown/North Beach Campus of the Community College District.

I have read the EIR which, in several material respects, fails to even address (never mind evaluate) numerous environmental impacts that the proposed development will have on the Association's members. As far as one can tell from reading 1 the EIR, the Community College District appears unaware that there are residential units only the width of Washington Street removed from the new campus. It is for that reason that I am submitting these comments.

The EIR provides a totally inadequate evaluation of the impact of the proposed "vertical" campus on people living and working in its immediate vicinity. The EIR devotes little attention and even less analysis to such direct impacts as anticipated increases in traffic, additional burdens on public transportation and sanitation, additional noise and available parking. These are important environmental considerations for the health and safety of a residential community located only twenty-five feet from the campus' proposed waste hauling and trash compactor facilities. Unfortunately, the EIR pays them scant attention.

Suffice it to say, introducing another 2,000 to 6,000
1 people into the Association's immediate neighborhood, from early morning until late at night, seven days a week, threatens a substantial erosion in the living environment of its members. Nowhere does the EIR take these matters adequately into account. Nor does it satisfactorily consider reasonable alternatives or other mitigating measures.

The educational mission of the Community College District, while important, does not justify a virtual abandonment of the environmental review process. The Association respectfully submits that the EIR is in need of substantial revisions so that planning personnel will have an accurate and complete environmental profile of the proposed campus before development decisions are made. Otherwise, public protections guaranteed by the California Environmental Quality Act will be rendered meaningless and hollow.

Very truly yours,

HASSARD BONNINGTON LLP

Philip S. Ward

Philip S. Ward

PSW:tdw

Letter 14: Philip S. Ward, Attorney at Law, Hassard Bonnington, LLP

Response 14-1

The comment focuses on impacts to the living environment of owners of the 33 residential condominium units located on the top seven floors of the 24-story Montgomery-Washington Tower at 655 Montgomery Street, opposite the project site at Washington Street. On p. 40 in Section III.A, Land Use and Zoning, of the DEIR, the 300-foot-tall Montgomery-Washington Tower is recognized for its residential use component.

The comment letter does not identify any specific deficiencies in the environmental analysis and therefore cannot be directly responded to. Traffic increases and traffic impacts are discussed in Section III.D, Transportation, including of transit, parking, and pedestrian impacts. Off-street freight loading facilities are discussed on p. 86 of the DEIR.

Hazards and hazardous materials are discussed in Appendix A, Notice of Preparation (NOP)/Initial Study, pp. A.36-A.38, together with other subject areas such as noise (pp. A.41 and A.42), and utilities and service systems including sanitation (pp. A.44 and A.45).

Mitigation measures to the identified impacts are discussed in Chapter IV, Mitigation Measures, while alternatives to the proposed project are discussed in Chapter V, Alternatives.

Please see also Response 9-25 regarding the maximum population expected to occur at the project site once the proposed campus is in full operation.

15

G. BLAND PLATT ASSOCIATES
HISTORIC PRESERVATION CONSULTANTS

May 20, 1998

Mr. Peter A. Goldstein,
Chief Operating Officer
City College of San Francisco
33 Gough Street
San Francisco, California 94103

Re: City College of San Francisco Chinatown/North Beach Campus
Draft EIR 98031039

Dear Mr. Goldstein:

Thank you for the opportunity to comment on the above-referenced DEIR.

ARCHITECTURAL DESIGN - Page 18.

I recognize that City College does not presently own the parcels that are the subject of this EIR, and consequently, would not wish to invest money in architectural designs at this time. The EIR is also quite clear that City College may well, probably will, exempt itself from all San Francisco Master Plan and Planning Code requirements which would include a structured future design review with public and private participation. I also note the particularly insensitive designs presented as Figures 3 through 5 on Pages 24-26. For these reasons, the text on Page 18 must be augmented to include specific design guidelines for the site against which future architectural submissions would be judged. Such guidelines were included in the City Planning Commission's approval of the larger project and should be evaluated by your Historic Preservation Architect and modified as appropriate. In addition, your Historic Preservation Architect would address the applicability of the design guidelines to "The Secretary of the Interior's Standards for the Treatment of Historic Properties" as those "Standards" relate to the compatibility of in-fill construction in an historic area. Please see the Landmarks Preservation Advisory Board's letters of October 21, 1996 and July 3, 1997. 1

In addition to augmenting the text of the EIR with specific guidelines, please specify the "neighborhood and community groups" you plan to consult. Does this include the City's Landmarks Preservation Advisory Board? The Foundation for San Francisco's Architectural Heritage? The California Office of Historic Preservation? Others? 2

PROJECT FUNDING - Page 34.

3 At this early stage, it is difficult to imagine that "the Board will decide whether to approve the project". Isn't it more likely that the Board would decide whether to proceed with the project with approval at a later date when more specific information, including appropriate architectural drawings, is available? How would the concerned public and interested neighbors be notified of such hearings? Will meeting notices be sent to all who have expressed an interest, including those who have commented on this DEIR? Which City and County bond measure provides site acquisition funds? What language in that bond measure permits use for this project? What is the total amount allocated by the Bond Measure to the Community College District? What is the amount required for acquisition?

4 It would seem that this is the appropriate place in the text for recognition of Four Seas agreement with the Foundation for San Francisco's Architectural Heritage dated July 12, 1988, regarding the Colombo Building. Per Section III. A.: "This Agreement shall be binding upon and inure to the benefit of the parties and their respective heirs, successors and assigns." Under terms of the Agreement, the Columbo Building would not be demolished until evidence is submitted to Heritage to demonstrate that sufficient financing is in place to assure that construction can be completed, and that Four Seas has obtained a permit from the City to commence construction of the project. Is the Community College District aware of this agreement? Does it plan to honor the agreement should it purchase the site? What other assurances is the District willing to provide? Over the next two to five years, will the District agree to maintain the building to prevent further deterioration? Will the buildings on the site continue to be rented to existing tenants, and to new tenants as spaces may be vacated?

ENVIRONMENTAL SETTING: LAND USE AND ZONING - Page 40.

5 In the first full paragraph on this page, the text reads: "The oldest buildings are those on Montgomery Street, which date to the early 1850's. The more well-known are on Jackson Street, dating to the 1860's...." These sentences are incorrect. There are three (3) buildings in the 700 block of Montgomery that date to the early 1850's, and there are an additional three (3) buildings on the North side of the 400 block of Jackson Street that date to the same period. While there is a building constructed in 1853 on the South side of the 400 Block of Jackson, all but one of the remaining buildings date to the 1860's. For verification of this information, see the San Francisco Department of City Planning's June 1971 report entitled "Jackson Square".

ENVIRONMENTAL SETTING: HISTORICAL/ARCHITECTURAL RESOURCES - Page 63.

6 THE JOHN G. ILS HOTEL/THE FONG BUILDING was documented by Page and Turnbull as part of the "Area of Potential Effect" (APE) or Zone of Influence in the Draft Summary Comments and Responses for the Kearny Street/Columbus Avenue Project, 94.615E and State Clearinghouse #86031123. See C&R.79 through C&R.101. Of the numerous buildings studied and recorded, only five (5) buildings were considered of sufficient importance for the consultant to complete the State of California's Historic Resources Inventory Form, known as a DPR 523 Form. One of those five forms was completed for the Ils Hotel/Fong Building as can be seen on C&R.62-63. Based upon available information, Page & Turnbull determined the Ils Hotel/Fong Building apparently eligible for listing in the National Register of Historic Places under Criterion C, which is architectural significance. Note the use of the term apparently eligible because only the State Historic Preservation Officer can make the actual determination. In the matrix itself, the Ils Hotel/Fong Building is Number 163 on C&R.100 which notes the building's ratings in other surveys; according to the legend on C&R.101, the Ils Hotel/Fong Building "appears eligible as contributor to a fully documented district. This designation represents the evaluator's opinion and the property has not been reviewed by the State Office of Historic Preservation. The property may contribute to either the Jackson Square District or Proposed Chinatown Historic District in the event that a redefining of boundaries occurs."

Normally, a completed DPR 523 Form is submitted to the California Office of Historic Preservation. It should be determined if this was done, and whether the building has been officially determined eligible for listing in the National Register of Historic Places. In this instance, reliance on a computer printout is not sufficient. Further, information in Heritage's survey files and from the North Beach Survey should be obtained and provided in this EIR together with the information on C&R.79-.101 cited above.

7 I note that there is no photograph of the Ils Hotel/Fong Building in this DEIR. Please provide one to aid decision makers.

8 Please see the first complete paragraph on Page 66 regarding the Columbo Building. What is the source for the last two sentences in the paragraph? The only accurate source would be Heritage's Executive Director. I am not aware that Heritage has a B* rating; it does, however, have a B+ rating. It is also important to know when Heritage first rated the Columbo Building, whether is was re-rated following more recent additional research, and whether Heritage agrees with the statement: "The B* rating means that Heritage considered the building not eligible for the National Register because of alterations or insufficient age." In its 1979 publication Splendid Survivors, Heritage

8 says that a B-rated building is of Major Importance and includes "Buildings which are of individual importance by virtue of architectural, historical and environmental criteria. These buildings tend to stand out for their overall quality rather than for any particular outstanding characteristics. B-group buildings are eligible for the National Register, and of secondary priority for City Landmark status." Based upon my experience, if the text of the DEIR were correct, the Heritage rating would have been lowered.

MITIGATION MEASURES - Pages 68-69; 111-112.

9 Recordation of the Columbo Building to Historic American Building Survey (HABS) standards does not mitigate the loss of a National Register eligible resource. This boiler plate approach to mitigation was rejected in the February 1997 League for Protection of Oakland's Architectural and Historic Resources v. City of Oakland et al., 52 Cal. App.4th 896: "Documentation of the historical features of the building and exhibition of a plaque do not reasonably begin to alleviate the impacts of its destruction.... This is so particularly where, as here, the plans for the substitute building remain tentative and vague. We conclude that the stated mitigation measures do not reduce the effects of the demolition to less than a level of significance."

10 What mitigation measures are proposed for demolition of the Ils Hotel/Fong Building based upon its architectural significance? Mitigation for this building is not even mentionned in the DEIR.

11 Additional mitigation is also required with respect to the lost housing units; mention of faculty and student housing at Treasure Island does not mitigate the loss of affordable housing here.

12 While the following would not mitigate the loss of historic resources "to less than a level of significance", this would seem to be the appropriate section to include recognition of the District's responsibilities under the above-referenced Heritage/Four Seas agreement: that the Columbo Building (and the Ils Hotel/Fong Building) would not be demolished until all financing is secure, and all approvals and permits have been granted, other impediments have been resolved, and Project Sponsor is ready to proceed. In the interim, the buildings will be properly maintained, and leased to the present tenants or to new tenants should vacancies occur; and design guidelines, together with renderings, will be prepared for approval by Heritage, the Landmarks Preservation Advisory Board acting as the Certified Local Government, and concerned community groups. Should City College be unable to go forward with its project, it would actually place the buildings in the National Register of Historic Places and convey an Historic Preservation Easement to a qualified not-for-profit organization before putting the parcels up for sale. If unable to accomplish these tasks itself, such would be a Condition of Sale in placing the properties on the market.

ALTERNATIVES - Pages 113-125.

There is an additional alternative that is not addressed in the DEIR: Chelsea Development's April 1, 1998 Purchase Offer for the site which would rehabilitate the Columbo Building at least in accordance with the "Secretary of the Interior's Standards for the Treatment of Historic Properties". Since the Purchase Offer was dated April 1, 1998, and the DEIR not published until April 23, 1998, why was this offer not presented as an Alternative? More recent information from the proposed purchaser sounds as though there are numerous variations of this Alternative that must be discussed in this DEIR. 13

Discussion of Alternative Sites on Pages 120-125 is not sufficiently complete to be helpful to the decision maker. Table 6 on Pages 124-125 is particularly frustrating because almost every entry states that the size "Would not meet program needs" without further explication. 14

APPENDIX B - HISTORIC RESOURCES

Appendix B at present consists of only one page, a map that might be used elsewhere in the text. Rather, Appendix B should be used to include the Page & Turnbull Area of Potential Effect Survey presented in the previous Comments and Responses Pages C&R.79 through .101. Other helpful inclusions would be information from the North Beach Survey and Heritage's files. 15

GENERAL COMMENTS

This DEIR relies too heavily on previous documents that future decision makers may or may not possess, and/or may not be adequately trained or sufficiently interested to sort through and absorb. Further, this proposed project is not similar enough to the earlier proposals to warrant such treatment. 16

Thank you again for the opportunity to comment.

Sincerely yours,

Gertrude B. Platt

Mrs. Bland Platt

Letter 15: Gertrude B. Platt, G. Bland Platt Associates

Response 15-1

Please see Response 1-2 regarding the design guidelines for the previous Kearny Street/Columbus Avenue Project. See Response 9-21 for additional discussion.

Response 15-2

The District has not finalized procedures for obtaining public and agency input into the design of the college facility, in part because the construction phase is not expected to occur for at least two years and probably longer. At present, there is no state funding for construction of this facility. While no list of community groups or public agencies has been compiled for design review, the District intends to provide broad-based notification of the design process and ask for public input at a public hearing well in advance of final design approval. Notice would be provided to community organizations and public agencies, as well as interested persons who notify in writing the District Administrative Offices (Attention: Peter Goldstein) at 33 Gough Street in San Francisco, CA 94103, that they would like to be placed on the notice distribution list for design review of the project. It is expected that the three preservation organizations mentioned in the comment would receive notice.

Response 15-3

Please see Response 15-2 regarding expected public process on design phase.

The City bond measure that provides site acquisition funds is Measure A passed by the voters on June 3, 1997. The bond measure sought bonds for a variety of educational projects for the San Francisco School District as well as the San Francisco Community College District. Language in the ballot measure refers to property acquisition, as well as property renovation. The measure authorized $50 million for the District. The amount proposed to be spent for site acquisition in Chinatown/North Beach is $5.3 million.

Response 15-4

The District is aware of the Settlement Agreement referenced in the comment. The District does not intend to demolish the Colombo Building until it has obtained the necessary financing and any required approvals for construction of a new college facility. If the District approves the project, it intends to maintain the buildings in good repair and to continue to rent the space to residential and commercial tenants.

Response 15-5

The comment is noted and the following changes have been made to the second and third sentences of the first full paragraph on DEIR p. 40:

> **The oldest buildings are those on Montgomery and Jackson Streets, which date back to the early 1850s. The more well-known are on Jackson Street, dating from the 1850s and 1860s, and it is from the latter that the whole district takes its name.**

These changes are for clarification purposes and do not change the conclusions of the EIR.

Response 15-6

Please see Response 9-16 regarding evaluation of the Fong Building as a historic resource.

Response 15-7

Photographs of the Fong Building have been included in the EIR as new Figures 18-4 and 18-5. Please refer to Response 9-17.

Response 15-8

Please refer to Response 1-4 regarding the B* rating of the Colombo Building by Heritage.

Response 15-9

Please see Response 1-3.

Response 15-10

Please refer to Response 9-16 regarding the evaluation of the Fong Building. Because demolition of the Fong Building was not found to be a significant adverse effect, CEQA Guidelines 15126(c) would not require identification of mitigation resources.

Response 15-11

Please see Response 13-3 regarding additional mitigation to reduce housing impacts and a discussion of the Treasure Island mitigation measure.

Response 15-12

Please see Response 15-2 regarding public input into design decisions, and Response 15-4 regarding timing of demolition. The District cannot commit at this time to placing the Colombo Building on the National Register or imposing a preservation easement on the property, should the District buy the property but be unable to build a college facility there, in view of the fact that such actions could adversely affect the District's investment.

Response 15-13

Please see Response 3-5 for discussion of the preservation scenario presented by the Chelsea Development Company.

Response 15-14

The alternative sites listed in Table 6 on DEIR pp. 124-125 were evaluated with respect to whether a site could accommodate the space program needs identified by the District. Sites that could not satisfy basic space program needs are labeled as such in the table. For clarification, the following changes have been made to the second paragraph on DEIR p. 123:

> **The Building Committee also considered 23 additional alternative sites. Many sites were found to be inadequate because basic space program needs, such as required number of classrooms, laboratories, and faculty offices, could not be**

> **accommodated at those sites. Table 6 lists properties considered for possible lease or purchase, and the general reasons the sites were not pursued further. After consideration of those sites, the District found no site available for lease or purchase that would meet project objectives.**

The above changes are for clarification and do not change the conclusions of the EIR.

Response 15-15

Please see Response 9-11 regarding inclusion of the Page & Turnbull surveys in the Draft EIR, Appendix B, and Response 9-13 regarding other historical reports.

Response 15-16

Please see Response 9-66 regarding incorporation by reference of information from prior EIRs. Please see responses above concerning commenter's requests for additional information in the EIR.

The above changes are for [illegible]

Responses 10-13

Please see Response 9-11 regarding [illegible]

Response 15-15

Please see Response 9-8 regarding [illegible]

Response 17-18

Please see Response 9-8 for discussion of the preservation [illegible] Preservation Company.

Response 18-19

The alternative sites listed on pages [illegible]

The Building Committee also considered 23 additional alternative sites. [illegible]

16

City and County of San Francisco **Recreation and Park Department**

May 22, 1998

Mr. Peter A. Goldstein
Chief Operating Officer
Community College
33 Gough Street
San Francisco, CA 94103

Re: Proposed City College of San Francisco Chinatown/North Beach Campus

Dear Mr. Goldstein:

The Recreation and Park Department has jurisdiction over several parks in the Chinatown area. Included among these are Portsmouth Square, St. Mary's Square and Woh Hei Yuen (Jackson and Powell Streets). The major concern that our Department may have relative to the new proposed City College Chinatown/North Beach Campus would be one of shadow impact on nearby Portsmouth Square. 1

We would greatly appreciate your comments regarding this potential impact and whether or not the Community College District would comply with the provisions of Proposition K - Shadow Ordinance which seeks to minimize shadow impacts on San Francisco's scarce open space resources.

Thank you for your attention in this matter.

Very truly yours,

Deborah Learner
Deborah Learner
Park Planner

DL:ems

c: Jasmine Kaw

goldstein598

McLaren Lodge, Golden Gate Park
501 Stanyan Street
San Francisco, CA 94117-1898

FAX: (415) 668-7130
Phone: (415) 831-2700

Letter 16: Deborah Learner, Park Planner, City and County of San Francisco Recreation and Park Department

Response 16-1

The Initial Study, DEIR Appendix A, discusses potential project shadow effects on pp. A.25-A.26. As discussed on p. A.26, computer modeling was performed for the project, and determined that the project would not add shade to Portsmouth Square at any time specified in City Planning Code Section 295 (Proposition K - the Shadow Ordinance, referred to in the comment). Therefore, the DEIR included no further shadow analysis. Please see also Response 9-52 regarding shadow effects.

17

State of California
GOVERNOR'S OFFICE OF PLANNING AND RESEARCH
1400 TENTH STREET
SACRAMENTO 95814

PETE WILSON
GOVERNOR

PAUL F MINER
DIRECTOR

May 27, 1998

PETER GOLDSTEIN
SAN FERANCIOSCO COMMUNITY COLLEGE DISTRICT
33 GOUGH STREET
SAN FRANCISCO, CA 94103

Subject: CITY COLLEGE OF SAN FRANCISCO CHINATOWN/NORTH BEACH CAMPUS SCH #: 98031039

Dear PETER GOLDSTEIN:

The State Clearinghouse submitted the above named environmental document to selected state agencies for review. The review period is closed and none of the state agencies have comments. This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. 1

Please call at (916) 445-0613 if you have any questions regarding the environmental review process. When contacting the Clearinghouse in this matter, please use the eight-digit State Clearinghouse number so that we may respond promptly.

Sincerely,

Antero A. Rivasplata

ANTERO A. RIVASPLATA
Chief, State Clearinghouse

Notice of Completion

See NOTE Below

SCH # 98031039

Mail to: St learinghouse, 1400 Tenth Street, Sacramento, CA 95814 916/445-0613

Project Title: City College of San Francisco Chinatown/North Beach Campus

Lead Agency: San Francisco Community College District
Address: 33 Gough Street
City: San Francisco
Zip: 94103

Contact Person: Peter A. Goldstein
Phone: (415) 241-2229
County: San Francisco

Project Location

County: San Francisco
City/Nearest Community: San Francisco
Cross Streets: Washington Street, Columbus Avenue
Total Acres: 0.5
Assessor's Parcel No. 195, Lots 4, 5, 12
Section: N/A
Twp. 1.S
Range: 5.W
Base: USGS San Francisco North
Within 2 Miles: State Hwy #: 80
Waterways: San Francisco Bay
Airports: ______
Railways: ______
Schools: ______

Document Type

CEQA:
☐NOP
☐Early Cons
☐Neg Dec
☒Draft EIR
☐Supplement/Subsequent EIR (Prior SCH No.)______
☐Other______

NEPA:
☐NOI
☐EA
☐Draft EIS
☐FONSI

Other:
☐Joint Document
☐Final Document
☐Other______

Local Action Type

☐General Plan Update
Amendment
Element
Plan
☐Specific Plan
☐Master Plan
☐Planned Unit Development
☒Site Plan
☐Rezone
☐Prezone
☐Use Permit
☐Land Division (Subdivision, Parcel Map, Tract Map, etc.)
☐Annexation
☐Redevelopment
☐Coastal Permit
☒Other Land Acquisition

Development Type

☐Residential: *Units*____ *Acres*____
☐Office: *Sq.ft.*____ *Acres*____ *Employees*____
☐Commercial: *Sq.ft.*____ *Acres*____ *Employees*____
☐Industrial: *Sq.ft.*____ *Acres*____ *Employees*____
☒Educational college classroom facility, laboratories (language & computers)
☐Recreational____
☐Water Facilities: *Type*____ *MGD*____
☐Transportation: *Type*____
☐Mining: *Mineral*____
☐Power: *Type*____ *Watts*____
☐Waste Treatment: *Type*____
☐Hazardous Waste: *Type*____
☐Other:____

Project Issues Discussed in Document

☒Aesthetic/Visual
☐Agricultural Land
☐ Air Quality
☒Archaeological/Historical
☐Coastal Zone
☐Drainage/Absorption
☐Economic/Jobs
☐Fiscal
☐Flood Plain/Flooding
☐Forest Land/Fire Hazard
☒Geologic/Seismic
☐Minerals
☐Noise
☒Population/Housing Balance
☐Public Services/Facilities
☐ Recreation/Parks
☐Schools/Universities
☐Septic Systems
☐Sewer Capacity
☐Soil Erosion/Compaction/Grading
☐Solid Waste
☒Toxic/Hazardous
☒Traffic/Circulation
☐Vegetation
☐Water Quality
☐Water Supply/Groundwater
☐Wetland/Riparian
☐Wildlife
☒Growth Inducing
☒Land Use
☒Cumulative Effects
☐Other____

Present Land Use/Zoning/General Plan Use

The project site is in a high-density urban area, with Chinatown adjacent to the west and North Beach adjacent to the northwest. Adjacent to the south and southeast are the high-rise office buildings of the Financial District. Other buildings in the vicinity are two- to six-story commercial, residential, or mixed-use structures. Portsmouth Square, a public park, is located to the southwest, and the Jackson Square Historic District occupies approximately four blocks directly east of the project site on Columbus Avenue.

Project Description

The project involves acquisition of three parcels and construction of a college classroom facility. The project would relocate all existing satellite site locations of the Chinatown/North Beach Campus, except for the Marina Middle School site, to the new facility. The project would include demolition of the Colombo Building at 1-21 Columbus Avenue and 610-622 Washington Street, and the Fong Building at 49-55 Columbus Avenue.

State Clearinghouse Contact: Mr. Chris Belsky
(916) 445-0613

State Review Began: 4-24-98
Dept. Review to Agency 5-18
Agency Rev to SCH 5-22
* SCH COMPLIANCE 5-26

Please note SCH Number on all Comments

98031039

Please forward late comments directly to the Lead Agency

AQMD/APCD 2 (Resources: 4/25)

* Shortened Review

Project Sent to the following State Agencies

X **Resources**
___ Boating
___ Coastal Comm
___ Coastal Consv
___ Colorado Rvr Bd
X Conservation
X Fish & Game # 3
___ Delta Protection
___ Forestry
X X Parks & Rec/OHP
___ Reclamation
X BCDC
___ DWR
___ OES
Bus Transp Hous
___ Aeronautics
___ CHP
X Caltrans # 4
___ Trans Planning
___ Housing & Devel
Health & Welfare
___ Drinking H20
___ Medical Waste
State/Consumer Svcs
___ General Services
Cal/EPA
___ ARB
___ CA Waste Mgmt Bd
___ SWRCB: Grants
___ SWRCB: Delta
___ SWRCB: Wtr Quality
___ SWRCB: Wtr Rights
X Reg. WQCB # 2
___ DTSC/CTC
Yth/Adlt Corrections
___ Corrections
Independent Comm
___ Energy Comm
X NAHC
___ PUC
___ Santa Mn Mtns
X State Lands Comm
___ Tahoe Rgl Plan
___ Other: ______

Letter 17: Antero A. Rivasplata, Chief, State Clearinghouse, Governor's Office of Planning and Research

Response 17-1

The letter from the Governor's Office of Planning and Research indicates that the District has complied with state requirements for the review of DEIRs by state agencies.

APPEARANCES

THE HONORABLE BOARD OF TRUSTEES

ROBERT E. BURTON
RODEL E. RODIS
ANDREA D. SHORTER
ROBERT P. VARNI
LAWRENCE WONG

DEL M. ANDERSON, CHANCELLOR
RON LEE, GENERAL COUNSEL

BE IT REMEMBERED THAT ON TUESDAY, MAY 19, 1998, COMMENCING AT THE HOUR OF 6:17 P.M. THEREOF, AT SAN FRANCISCO, CALIFORNIA, BEFORE ME, AURA N. CLENDENEN, A CERTIFIED SHORTHAND REPORTER FOR THE STATE OF CALIFORNIA, THE FOLLOWING PROCEEDINGS WERE HELD.

PRESIDENT RODIS: WE'LL BE STARTING SHORTLY. IF YOU WOULD LIKE TO SPEAK, PLEASE FILL OUT THE YELLOW CARDS AND GET THEM TO THE FRONT. I WILL BE CALLING PEOPLE BY THE YELLOW CARDS.

GOODS EVENING, EVERYONE. THIS IS A SPECIAL MEETING OF THE SAN FRANCISCO COMMUNITY COLLEGE DISTRICT, AND BEFORE WE START THE MEETING, WE'RE GOING TO START WITH THE PLEDGE OF ALLEGIANCE AND THEN THE ROLL CALL.

(PLEDGE OF ALLEGIANCE RECITED.)

TRUSTEE RODIS: ROLL CALL.

CHANCELLOR ANDERSON: TRUSTEE NATALIE BERG: ABSENT.

TRUSTEE ROBERT BURTON.

TRUSTEE BURTON: YEAH.

CHANCELLOR ANDERSON: TRUSTEE JAMES MAYO: ABSENT.

TRUSTEE RODEL RODIS.

PH

PRESIDENT RODIS: PRESENT.

CHANCELLOR ANDERSON: TRUSTEE ANDREA SHORTER.

TRUSTEE SHORTER: HERE.

CHANCELLOR ANDERSON: TRUSTEE LAWRENCE WONG.

TRUSTEE WONG: HERE.

CHANCELLOR ANDERSON: TRUSTEE ROBERT VARNI.

TRUSTEE VARNI: HERE.

CHANCELLOR ANDERSON: STUDENT TRUSTEE LISA ROBINS: ABSENT.

TRUSTEE RODIS: GOOD EVENING, EVERYONE. THANK YOU FOR ATTENDING TONIGHT.

I'D LIKE TO OPEN THIS PUBLIC HEARING STARTING THE OFFICIAL RECORD THAT WILL BE KEPT BY OUR COURT REPORTER. BEFORE WE BEGIN, I WILL SPEND A FEW MINUTES EXPLAINING THE PURPOSE OF THIS PUBLIC HEARING AND HOW IT WILL BE CONDUCTED.

THIS IS THE OFFICIAL PUBLIC HEARING ON THE DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE PROPOSED CITY COLLEGE OF SAN FRANCISCO CHINATOWN/NORTH BEACH CAMPUS PROJECT, WHICH I'LL BE REFERRING TO TONIGHT AS THE "PROPOSED PROJECT."

MY NAME IS RODEL RODIS. I AM THE PRESIDENT OF THE BOARD OF TRUSTEES FOR THE SAN FRANCISCO COMMUNITY COLLEGE DISTRICT, AND I WILL BE CHAIRING THE HEARING THIS EVENING.

THIS HEARING IS BEING CONDUCTED PURSUANT TO THE SAN FRANCISCO COMMUNITY COLLEGE DISTRICT PROCEDURE FOR IMPLEMENTATION OF THE CALIFORNIA ENVIRONMENTAL QUALITY ACT. THE PURPOSE OF THE HEARING IS TO PROVIDE THE PUBLIC WITH AN OPPORTUNITY TO COMMENT ON AND PRESENT EVIDENCE RELATING TO THE DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE PROPOSED PROJECT.

THE ENVIRONMENTAL IMPACT REPORT IS COMMONLY REFERRED TO AS THE EIR. ALL COMMENTS MADE TONIGHT WILL BE RECORDED BY THE COURT REPORTER AND WILL BECOME PART OF THE FORMAL RECORD.

THE TRANSCRIPT OF THIS HEARING WILL BE PRESENTED TO THE BOARD OF TRUSTEES FOR THE SAN FRANCISCO COMMUNITY COLLEGE DISTRICT, THE LEAD AGENCY FOR THIS ACTION, FOR THEIR REVIEW WHEN THEY CONSIDER THE FINAL ENVIRONMENTAL IMPACT REPORT.

ALL TESTIMONY THIS EVENING, AS WELL

AS ALL WRITTEN COMMENTS RECEIVED DURING THE PUBLIC COMMENT PERIOD, WILL BECOME PART OF THE FINAL ENVIRONMENTAL IMPACT REPORT FOR THIS PROJECT. THE DISTRICT WILL EVALUATE COMMENTS RECEIVED ON ENVIRONMENTAL ISSUES AND WILL INCLUDE WRITTEN RESPONSES TO THESE COMMENTS IN THE FINAL EIR.

THOSE OF YOU WHO DO NOT WISH TO SPEAK TONIGHT BUT WHO HAVE COMMENTS OR CONCERNS ABOUT THE ENVIRONMENTAL IMPACT REPORT MAY SUBMIT YOUR COMMENTS IN WRITING. WRITTEN COMMENTS MUST BE RECEIVED BY 5:00 P.M. SATURDAY, MAY 23, 1998, TO BE CONSIDERED BY THIS DISTRICT. MAY 23 IS THE CLOSE OF THE OFFICIAL COMMENT PERIOD ON THE DRAFT EIR.

THE DUE DATE AND THE ADDRESS THAT COMMENTS SHOULD BE SENT TO ARE AVAILABLE AT THE SIGN-UP TABLE. COPIES OF THE DRAFT EIR ARE AVAILABLE HERE AT THE TABLE. TOMORROW EXTRA COPIES WILL BE AVAILABLE AT 33 GOUGH STREET IN SAN FRANCISCO, THE DISTRICT'S ADMINISTRATIVE OFFICES. IN ADDITION, COPIES OF THE DRAFT EIR MAY BE REVIEWED AT THE MAIN PUBLIC LIBRARY AND THE CHINATOWN/NORTH BEACH BRANCHES OF THE PUBLIC LIBRARY.

I ENCOURAGE SPEAKERS WHO AGREE WITH PREVIOUS SPEAKERS TO SIMPLY CONFIRM THEIR AGREEMENT IN ORDER TO AVOID REPETITION. EVERYONE WHO WISHES TO SPEAK THIS EVENING WILL BE ALLOWED TO SPEAK. ANYONE WHO WOULD LIKE TO SPEAK SHOULD FILL OUT THIS YELLOW CARD SO INDICATING, HANDED TO SOMEONE HERE AT THE SIGN-UP TABLE, AND I'LL CALL YOU IN THE ORDER I RECEIVE YOUR CARD.

EACH SPEAKER WILL BE ALLOWED THREE MINUTES TO COMMENT ON THE DRAFT EIR. SO THAT YOUR TESTIMONY CAN BE ACCURATELY RECORDED AND THE DISTRICT CAN RESPOND ADEQUATELY TO YOUR COMMENTS IN THE FINAL ENVIRONMENTAL IMPACT REPORT, I WILL ASK EACH SPEAKER TO COME AND SPEAK INTO THE MICROPHONE.

AS I STATED PREVIOUSLY, THE PURPOSE OF THIS HEARING IS TO RECEIVE PUBLIC TESTIMONY ON THE EIR FOR THE SAN FRANCISCO COMMUNITY COLLEGE DISTRICT CHINATOWN/NORTH BEACH CAMPUS PROJECT. THEREFORE, BOARD MEMBERS WILL NOT RESPOND TO COMMENTS OR CONCERNS TONIGHT.

AFTER THE CLOSE OF THE PUBLIC REVIEW PERIOD ON SATURDAY, THE DISTRICT WILL REVIEW ALL COMMENTS RECEIVED AND WILL PREPARE WRITTEN

RESPONSES THAT WILL BE PUBLISHED IN THE FINAL EIR THAT IS EXPECTED TO BE COMPLETED BY THE END OF JUNE.

BEFORE DECIDING WHETHER TO APPROVE THE PROPOSED PROJECT, THE DISTRICT WILL CONSIDER THE FINAL EIR, THE ENVIRONMENTAL IMPACT ASSOCIATED WITH THE PROPOSED PROJECT AND POTENTIAL MITIGATION MEASURES AND ALTERNATIVES OF THE PROPOSED PROJECT.

WE WILL BE GLAD TO ANSWER ANY PROCEDURAL QUESTIONS ABOUT THE HEARING THIS EVENING. DOES ANYONE HAVE ANY QUESTIONS ABOUT THIS HEARING, HOW THIS HEARING WILL PROCEED?

I WOULD ALSO LIKE TO SAY THAT EVER SINCE WE STARTED ON THIS PROJECT WE HAVE HEARD COMMENTS AND CONCERNS ABOUT THE EFFECT ON THE TENANTS WHO ARE RESIDING IN ONE PART OF THE PREMISES. WE ARE CERTAINLY GOING TO DO EVERYTHING WE CAN TO SEE THAT REPLACEMENT HOUSING WILL BE FOUND FOR THEM, AND ANY OTHER WORK THAT WE CAN DO IN CONNECTION WITH THAT.

THIS IS ONE OF THE REASONS FOR THIS HEARING: WE CAN BE ABLE TO FIND OUT THOSE CONCERNS AND WE CAN BE ABLE TO ADDRESS THEM SO THAT THE INTEREST OF EVERYONE IN THE CITY WILL

BE HEARD AND ADDRESSED.

WITH THAT, I'D LIKE TO --

TRUSTEE WONG: MR. PRESIDENT, BEFORE WE PROCEED, PROCEDURALLY, FIRST OF ALL, THE BOARD REALLY APPRECIATES EVERYBODY COMING OUT TO SPEAK, THE ENERGY EXPENDED, BUT IN PARTICULAR TO THOSE WHO ARE DISABLED AND WHO ARE SENIORS.

I WOULD LIKE TO ASK THE BOARD TO ALLOW THOSE DISABLED SPEAKERS TO COME FORTH FIRST SO THAT IF THEY NEED TO LEAVE THAT THEY CAN, BECAUSE WE RECOGNIZE HOW DIFFICULT IT IS FOR THEM TO COME OUT, ALSO SENIORS WHO MAY BE INTERESTED TO SPEAK TO ALLOW THEM TO SPEAK ALSO FIRST.

TRUSTEE RODIS: OKAY. MR. BOB PLANTHOLD.

MR. PLANTHOLD: THANK YOU. I'M BOB PLANTHOLD. IN DESPITE MY DISABILITY, I AM ALSO A SINGLE PARENT SO THAT IN A LITTLE BIT, I LEAVE IN A TURN BACK INTO DADDY.

BUT I CAME HERE TONIGHT PARTLY BECAUSE I'M A HAPPY GRADUATE, YEARS AGO, OF CITY COLLEGE, AND I HAVE THAT KNOWLEDGE OF HOW DIFFICULT IT IS TO GET AROUND THAT MAIN HILLY CAMPUS.

I BRING THAT UP BECAUSE THERE IS A ↓1

HIDDEN BENEFIT THAT IS IGNORED IN THIS EIR, AND
MAYBE IT'S BECAUSE IT'S A MATTER OF LAW. UNDER
CALIFORNIA'S BUILDING CODE, ANY NEW BUILDING
MUST BE FULLY ACCESSIBLE. RIGHT NOW ALL YOUR
MULTIPLE RENTED SITES IN THIS AREA ARE NOT. SO
YOU ARE EXCLUDING STRUCTURALLY MANY, MANY, MANY
PEOPLE, WHETHER THEY'RE DISABLED OR FRAIL
SENIORS WHO WANT TO LEARN ENGLISH AND TAKE
1 CITIZENSHIP CLASSES. THAT'S A BENEFIT TO YOUR
OUTREACH, TO YOUR DIVERSITY, TO YOUR FUNDING
BASE. YOU NEED TO KEEP THAT IN MIND, AND THOSE
WHO DO EIR'S NEED TO KEEP THAT FACT IN MIND.

BUT ACCESSIBILITY IS IMPORTANT IN
OTHER WAYS TOO. IT WOULD ALLOW US TO
POTENTIALLY HAVE JOBS, WHETHER IN THE CHILD
CARE CENTER AS TEACHERS OR AS ADMINISTRATORS.

NOW, I WANT TO ADDRESS A CONCERN
ABOUT SOME ASPECTS OF THE HISTORICITY OF
CURRENT STRUCTURES. THIS HAS BEEN A TROUBLING,
TROUBLING ISSUE. TOO OFTEN WHEN THERE HAS BEEN
2 AN HISTORIC STRUCTURE THERE HAS BEEN NO --
ZERO -- OUTREACH TO THE DISABLED COMMUNITY
ABOUT HOW TO PLAN TO MAKE ANY ATTEMPTS TO
PROVIDE ACCESS.

WE HAVE BEEN STRUCTURALLY SHUTOUT

FROM MANY HISTORIC BUILDINGS WHEN THEY UNDERGO
MODERNIZATION.

I'M BRINGING THAT TO YOUR ATTENTION
BECAUSE, AS YOU HAVE A CHANCE TO START ANEW, DO
NOT ENSHRINE IN STONE THE INACCESSIBILITIES OF
THE PAST. PLEASE GO FORWARD WITH A GRAND
SPANKING NEW CAMPUS. I WANT TO GIVE YOU JUST A
LITTLE BIT OF BUILDING CODE KNOWLEDGE BECAUSE
YOU'RE GOING TO HEAR OPTIONS SUGGESTED ON THE
SPOT TONIGHT.

I'VE SEEN SOME OF THOSE OPTIONS IN
WRITING WHERE THERE IS A REQUEST TO NOT TAKE
PART OF AN HISTORIC BUILDING, TAKE ANOTHER LOT, 2
REDO YOUR WHOLE STRUCTURE. YOU MAY AT SOME
POINT WANT TO CONSIDER THAT AS AN ATTEMPT TO
MITIGATE THE IMPACT ON A HISTORIC STRUCTURE,
BUT WHEN YOU HEAR THAT, YOU HAVE TO LOOK AND
KNOW SOME OF THE DETAILS OF ACCESS.

THE EXAMPLE: SOME OF THESE OPTIONS
SAY "LOWER THE LOBBY. LOWER THE VESTIBULE
OUTSIDE THE AUDITORIUM OR RAISE FROM
STREET-FLOOR LEVEL THE UTILITY ROOM."
EVERYTHING HAS TO BE ACCESSIBLE, AND THAT MEANS
RAMPS OR LIFTS.

FOR A RAMP, FOR EVERY INCH CHANGE

2 FROM THE FLOOR LEVEL, THE RAMP HAS A ONE-FOOT LENGTH MINIMUM TO BE CODE COMPLIANT. SO WHEN YOU HEAR OR SEE OPTIONS PLANS COMING FROM ANYBODY WHO SAYS "LOWER THE VESTIBULE BY THREE FEET OR FOUR FEET FROM STREET LEVEL," YOU'RE TALKING A 36-FOOT OR 48-FOOT RAMP. YOU HAVE TO BE AWARE OF THE DEVIL IN THE DETAILS WHEN PEOPLE SAY, "PRESERVE THE STONE." HOW DOES PRESERVING THE STONE AFFECT THE PEOPLE? AND WHEN PEOPLE DON'T PLAN FOR PEOPLE AND ONLY PLAN FOR STONE, WE'RE SHUTOUT.

SO DO BE AWARE OF ANY OPTION ON THE SPOT PROPOSED. NOBODY HAS COME TO US. NOBODY HAS PUT INTO ANY CONSIDERATION, DISABLED ACCESS, FOR ANY OF THESE NEW OPTIONS. BEWARE: DON'T LET YOURSELVES GET STAMPEDED, ACT PRUDENTLY WHENEVER YOU MAKE A DECISION.

3 YOUR CURRENT PLAN, I MAINTAIN, IS UNFORTUNATELY, UNFORTUNATELY THE BEST DOABLE. BY THAT, I DON'T MEAN I SUPPORT JUST ELIMINATING THAT AFFORDABLE HOUSING. CLEARLY, YOU'RE GOING TO HAVE TO DO SOMETHING ABOUT THAT. I DON'T KNOW IF THE TREASURE ISLAND OPTION IS PRUDENT.

I WANTED TO TALK ABOUT THE

CONSTITUENCY THAT I SEE THE BENEFITS FROM. OTHERS WILL BE TALKING TO YOU ABOUT THAT, BUT PLEASE GO AHEAD. THANK YOU.

TRUSTEE RODIS: THANK YOU.

IS THERE ANY OTHER DISABLED PERSON WHO WOULD LIKE TO COME FORWARD AND SPEAK?

COULD YOU GIVE YOUR NAME, PLEASE, SO THAT IT CAN BE DULY RECORDED.

MS. CHANG: (SPEAKING IN NATIVE TONGUE.)

PRESIDENT RODIS: THANK YOU. CAN SOMEONE TRANSLATE, PLEASE, AND GIVE THE NAME.

TRANSLATOR: HI, MY NAME IS MIMI CHANG, AND I AM A RESIDENT OF SAN FRANCISCO.

4 I HAVE BEEN SO LONGING TO STUDY IN THE CITY COLLEGE OF SAN FRANCISCO, BUT FOR A LONG TIME, MY OPPORTUNITY HAS BEEN LIMITED BECAUSE A LOT OF THE SCHOOL ARE NOT HANDICAP ACCESSIBLE. UNTIL THE OPENING OF ST. MARY'S SCHOOL, I HAVE THE CHANCE TO STUDY. I WOULD REALLY LIKE TO SEE THAT THE CITY COLLEGE OF SAN FRANCISCO CHINATOWN/NORTH BEACH CAMPUS CAN BE LOCATED AT THIS NEW SITE WITH THE FACILITY TO BE ACCESSIBLE BY THE HANDICAP PERSONS, SO I HAVE EVERY CHANCE TO LEARN AND TO GROW FOR MYSELF. THANK YOU.

PRESIDENT RODIS: THANK YOU.

MS. PO YEE AU WILL BE FOLLOWED BY MS. LUNA YASUI OF THE CHINESE FOR AFFIRMATIVE ACTION.

MS. YEE AU: HI MY NAME IS PO YEE AU. I'M SPEAKING ON BEHALF OF ALL MY STUDENTS WHO IS COMING TO SUPPORT THE CITY COLLEGE CHINATOWN/NORTH BEACH CAMPUS TODAY.

WE NEED OUR PERMANENT HOME HERE AND NOW IN CHINATOWN. WE HAVE BEEN LONGING FOR PERMANENT HOME FOR THE CHINATOWN/NORTH BEACH CAMPUS FOR DECADES. I REMEMBER IT WAS ON THE AGENDA WHEN I FIRST STARTED MY WORK AS SELF-HELP FOR THE ELDERLY BACK IN 1983, AND THEREAFTER THERE HAVE BEEN NUMEROUS DISCUSSIONS, MEETINGS AFTER MEETINGS, ON THE NEEDS OF HAVING MORE SPACE, MORE FACILITIES, MORE RESOURCES, MORE CLASSES, AND EVENTUALLY, IT BOILED DOWN TO THE NEED TO HAVE AN ADEQUATE PERMANENT SCHOOL.

WE ARE ACTUALLY VERY PLEASED TO KNOW THAT NOW WE HAVE HAD THE CHANCE TO BUILD A BRAND NEW CAMPUS AND TO BUILD OUR HOME IN CHINATOWN TODAY.

LET'S ALL WORK TOGETHER AND BUILD A CHINATOWN CAMPUS FOR OUR COMMUNITY. THIS NEW HOME IS IMPORTANT TO US. IT NURTURES EVERY MEMBER OF OUR COMMUNITY. IT HELPS THE MONOLINGUAL NEW IMMIGRANT TO LEARN ENGLISH AS WELL AS TO LEARN ABOUT OUR COUNTRY AND BECOME GOOD CITIZENS.

IT PROVIDES ESSENTIAL JOB TRAINING, BASIC SKILLS, COMPUTER, AND NEW TECHNOLOGY, AND MORE FOR OUR YOUNGSTERS, ADULTS, WORKING PARENTS, AND OLDER WORKERS.

WE NEED THIS NEW HOME. OVER THE YEARS, SELF-HELP FOR THE ELDERLY WITH THE SUPPORT OF THE CHINATOWN/NORTH BEACH CAMPUS HAS HELPED MORE THAN 3,000 NEW IMMIGRANTS TO BE TRAINED AS HOUSEKEEPERS AND CERTIFIED HOME HEALTH AIDS.

WITH THE CRITICAL NEED FOR NATURALIZATION, EVERY YEAR WE ASSIST MORE THAN 600 SENIOR STUDENTS TO TAKE THE CITIZENSHIP EXAMINATION. IN ADDITION, WE HAVE MANY OTHER ESL AND EDUCATIONAL PROGRAMS. IN ALL, THIS WE WORK IN CONJUNCTION WITH THE CITY COLLEGE CHINATOWN/NORTH BEACH CAMPUS.

THIS NEW PERMANENT CAMPUS IS IMPORTANT IN THAT IT PROVIDES A CENTRALLY

5 LOCATED SITE, WHICH IS EASILY ACCESSIBLE BY BOTH ABLE AND HANDICAPPED PERSONS. THIS SITE IS FLEXIBLE WITH ROOM FOR EXPANSION OF NEW PROGRAMS.

A PERMANENT SITE WILL ALLOW FOR LONG-RANGE PLANNING. THE NEW CAMPUS WILL GIVE THE COMMUNITY A GREATER SENSE OF IDENTITY AND PRIDE. ALL OF THESE ARE IMPORTANT TO THE CHINESE COMMUNITY, AND I URGE ALL OF YOUR SUPPORT OF THIS ESSENTIAL PROJECT.

PRESIDENT RODIS: THANK YOU.

MS. LUNA YASUI WILL BE FOLLOWED BY ISABEL HUIE.

6 MS. YASUI: GOOD EVENING. MY NAME IS LUNA YASUI. TONIGHT I'M SPEAKING ON BEHALF OF THE CHINESE FOR AFFIRMATIVE ACTION AND A COALITION OF GROUPS AND INDIVIDUALS COMMITTED TO INCREASING EDUCATIONAL AND VOCATIONAL RESOURCES FOR CHINATOWN/NORTH BEACH RESIDENTS.

MANY OF THE MEMBERS WILL SPEAK TODAY AND ARE WEARING THE GREEN STICKERS TO SHOW THEIR SUPPORT. FOR THE RECORD, MEMBERS WHO CANNOT BE HERE TONIGHT BUT HAVE EXPRESSED THEIR SUPPORT IN WRITING ARE SUPERVISOR MABEL TENG, SUPERVISOR LELAND YEE, FORMER SUPERVISOR TOM

6 SHAY, THE ASIAN PACIFIC DEMOCRATIC CLUB, ROBERTA ^ ACTENBERG OF THE SAN FRANCISCO CHAMBER OF COMMERCE, THE CHINESE COMMUNITY DEVELOPMENT CENTER (FORMALLY THE CHINESE COMMUNITY HOUSING CORPORATION AND CHINATOWN RESOURCE CENTER) THE CHINESE CHAMBER OF COMMERCE, UNLOCK (PHONETIC) HEALTH SERVICES, COMMUNITY EDUCATIONAL SERVICES, ASIAN-AMERICANS FOR COMMUNITY EDUCATION, THE ASIAN-AMERICAN ARCHITECTS AND ENGINEERS, THE CHINATOWN YOUTH CENTER, ASIAN WOMEN RESOURCE CENTER, CAMERON HOUSE, AND THE NORTHEAST FEDERAL COMMUNITY CREDIT UNION.

WE ASK THE BOARD TO DECIDE IN FAVOR OF ESTABLISHING A PERMANENT CHINATOWN/NORTH BEACH CAMPUS. THE NEW CAMPUS IS AN EXCELLENT PROPOSAL THAT WILL ELIMINATE SOME OF THE MOST DAUNTING BARRIERS TO QUALITY EDUCATION. FIRST, THE CURRENT CHINATOWN/NORTH BEACH CAMPUS SUFFERS FROM INADEQUATE CLASSROOM SIZING CAPACITY.

CITY COLLEGE HAS PLANNED TO NOT ONLY EFFECTIVELY MEET THE CURRENT DEMAND BUT PREPARE FOR THE ANTICIPATED GROWTH IN ENROLLMENT DUE TO WELFARE REFORM LAWS.

6 THE CITY AND COUNTY OF SAN FRANCISCO HAS DESIGNATED CITY COLLEGE AS THE PRIMARY EDUCATIONAL INSTITUTION THAT WILL PROVIDE TRAINING TO WELFARE RECIPIENTS. UNDER THE STRICT REQUIREMENTS MANDATED BY FEDERAL WELFARE LAWS, NOT ONLY WILL THERE BE MORE PEOPLE INTERESTED IN ESL AND EDUCATIONAL PROGRAMS, BUT THERE WILL BE AN INCREASED NEED FOR THESE TWO TYPES OF PROGRAMS TO BE INTEGRATED.

QUALITY VOCATIONAL TRAINING COUPLED WITH ESL CLASSES ARE CRUCIAL TO SECURING A LIVABLE-WAGE JOB. A PERMANENT CHINATOWN/NORTH BEACH CAMPUS WITH THE CAPACITY TO MEET THESE GROWING NEEDS IS CRITICAL TO THE LONG-TERM GROWTH OF THE COMMUNITY.

7 SECOND, AS BOB PLANTHOLD HAS ALREADY STATED, DUE TO INACCESSIBLE FACILITIES, THE CURRENT CITY COLLEGE SITUATION PREVENTS MANY ELDERLY RESIDENTS OR PERSONS WITH DISABILITY FROM ENROLLING.

THE NEW FACILITY WOULD ENABLE CITY COLLEGE TO OFFER COURSES IN A BUILDING THAT IS FULLY ACCESSIBLE AND IN COMPLIANCE WITH THE AMERICANS WITH DISABILITIES ACT.

BECAUSE OF THE DIFFICULTY IN MAKING

7 OLD BUILDINGS FULLY ACCESSIBLE, WE SUPPORT THE DECISION TO BUILD A NEW CAMPUS FACILITY.

8 THIRD, AND LAST, FOR MANY WORKING AND SINGLE-PARENT FAMILIES, CHILD CARE IS A DECIDING FACTOR IN WHETHER TO TAKE A JOB OR TO PURSUE AN EDUCATIONAL PATH. LACK OF REASONABLE CHILD CARE SHOULD NOT BE PREVENT ANYONE FROM OBTAINING AN EDUCATION. THE PROPOSED CHILD-CARE FACILITY MAKES PURSUING AN EDUCATION AT CITY COLLEGE A REALITY FOR THESE WORKING FAMILIES.

AGAIN, WE URGE YOU TO DECIDE IN FAVOR OF BUILDING THIS NEW CAMPUS AND PROVIDING QUALITY EDUCATIONAL OPPORTUNITIES FOR GENERATIONS TO COME. THANK YOU.

TRUSTEE RODIS: ISABEL HUIE --

MS. YASUI: I'D ALSO LIKE TO SUBMIT THESE LETTERS.

TRUSTEE RODIS: -- BY NORMAN YEE. ISABEL HUIE AND THEN NORMAN YEE.

9 MS. HUIE: GOOD EVENING, BOARD OF TRUSTEES. I'M ISABEL HUIE FROM CHINESE FOR AFFIRMATIVE ACTION.

IN 1995, CHINESE FOR AFFIRMATIVE ACTION HELPED TO ORGANIZE THE DISABLED PEOPLE

9 FOR ACCESSIBLE CHINATOWN, OR DPAC, AS WE CALL IT, TO MAKE CHINATOWN MORE ACCESSIBLE FOR THE DISABLED COMMUNITY AND TO ACT AS A SUPPORT GROUP FOR EACH OTHER.

WE REALIZE THAT THIS MISSION WILL BE A MAJOR AND DIFFICULT CHALLENGE. AMONG THEIR MANY ACTIVITIES, MEMBERS OF DPAC, MANY OF WHOM ARE IN WHEELCHAIRS OR WITH OTHER PHYSICAL DIFFICULTIES, WENT THROUGH CHINATOWN STREETS TO IDENTIFY STREET CORNERS WHICH HAVE NOT BEEN CURB CUT. IT WAS BROUGHT TO THE ATTENTION OF THE PUBLIC WORKS DEPARTMENT WHO EVENTUALLY TOOK CARE OF THIS MATTER.

THE PHYSICALLY CHALLENGED COMMUNITY IS FIERCELY INDEPENDENT AND DETERMINED TO FIGHT FOR THEIR CIVIL RIGHTS. THEY, LIKE THE REST OF US, SEEK EDUCATIONAL OPPORTUNITIES TO MAKE THEMSELVES MORE MARKETABLE. THE PROPOSED CITY COLLEGE CAMPUS IN CHINATOWN WILL BE A NEW STRUCTURE OFFERING THE UNIQUE OPPORTUNITY TO ACCOMMODATE THE NEEDS OF PEOPLE WITH DISABILITIES, THEREBY, COMPLYING WITH TITLE II OF THE AMERICANS WITH DISABILITIES ACT AND SECTION 5404 OF THE 1973 REHABILITATION ACT.

AT TWO RECENT WEEKEND WORKSHOPS HELD IN CHINATOWN BY INDEPENDENT LIVING RESOURCE CENTER, OVER A HUNDRED PEOPLE WITH DISABILITIES ATTENDED EACH SESSION. THERE IS A CRYING NEED TO SERVE THIS COMMUNITY.

9 A COLLEGE CAMPUS IN CHINATOWN IS AN EXCITING AND VISIONARY CHALLENGE AND A WONDERFUL WAY TO EDUCATE SOCIETY THAT PEOPLE WITH DISABILITIES HAVE AN EQUAL RIGHT TO WORK, STUDY, LIVE, AND ENJOY THE COMMUNITY IN THE SAME WAY THAT NONDISABLED PEOPLE DO. I URGE THE BOARD TO DO ALL THEY CAN TO ACCOMMODATE PEOPLE WITH DISABILITIES.

10 IN ADDITION, I HAVE TWO STATEMENTS I WANT TO READ: ONE FROM SUPERVISOR MABEL TENG AND ONE FROM REVEREND HARRY CHUCK, BECAUSE BOTH OF THEM HAVE OTHER MEETINGS THAT THEY HAVE TO GO TO.

FROM MABEL TENG -- FROM SUPERVISOR TENG SHE SAYS, "I URGE YOU TO STRONGLY CONSIDER

> THE PROPOSED CHINATOWN/NORTH BEACH CAMPUS OF CITY COLLEGE AT THE CORNER OF WASHINGTON AND COLUMBUS STREET. AS WE ALL KNOW, THERE IS AN URGENT NEED TO CONSOLIDATE THE NINE EXISTING SITES OF THE CALIFORNIA NORTH BEACH

CAMPUS INTO A SINGLE LOCATION. PROGRAMS NEED TO BE EXPANDED, AND WE MUST MEET THAT NEED WITH A WELL THOUGHT-OUT SOLUTION. THE PROPOSED SITE PROVIDES THE OPPORTUNITY TO INCREASE CITY COLLEGE ACCESS TO A LARGER POPULATION AND EXPAND PROGRAMS TO MEET THAT INCREASE. THE NEW CAMPUS WILL OFFER STATE-OF-THE-ART COMPUTER TECHNOLOGY, ADDITIONAL ENGLISH AS A SECOND LANGUAGE COURSES, AND GREATER VOCATIONAL TRAINING PROGRAMS. THE CAMPUS WILL ALSO OFFER A LARGER NUMBER OF BUSINESS AND FINANCE COURSES. MOREOVER, WITH THE ADDITION OF A NEW CHILD-CARE CENTER, IMPROVED ACCESS TO PUBLIC TRANSPORTATION, AND FACILITIES DESIGNED TO PROVIDE FULL ACCESS TO PERSONS WITH DISABILITIES, THIS EXCEPTIONAL NEW CAMPUS WILL EXIST FOR GENERATIONS TO SERVE THE GROWING NEEDS OF THE CHINATOWN/NORTH BEACH COMMUNITY. AS SERVICES FOR IMMIGRANTS DECLINE

THROUGHOUT THE STATE, WE MUST BE DO WHAT WE CAN TO HELP THEM TO HELP THEMSELVES. PROVIDING NECESSARY EDUCATIONAL RESOURCES IS A MAJOR COMPONENT. THIS CAMPUS IS INTEGRAL IN ASSISTING THE LARGE NUMBERS OF IMMIGRANTS TO ASSIMILATE AND SUCCEED. THANK YOU FOR YOUR DEDICATION TO BRING A PERMANENT CAMPUS TO CHINATOWN. I OFFER YOU MY COMPLETE SUPPORT AND INVITE YOU TO CONTACT ME IF I CAN BE OF ANY ASSISTANCE. SINCERELY, MABEL TENG, MEMBER BOARD OF SUPERVISORS AND CHAIR OF THE FINANCE COMMITTEE."

THIS STATEMENT IS FROM THE REVEREND HARRY CHUCK OF CAMERON HOUSE.

"DEVELOPMENT AND CONSTRUCTION OF A COMMUNITY COLLEGE CENTERED IN THE CHINATOWN AREA MAKES A GREAT DEAL OF SENSE, BOTH COMMON SENSE AND DOLLAR SENSE.

CHINATOWN, WHERE WE HAVE THE CITY'S HIGHEST POPULATION, DENSITY, AND PROBABLY THE GREATEST CONCENTRATION

10 OF NEW IMMIGRANTS, REPRESENTS AN IDEAL LOCATION FOR TEACHING AND LEARNING AMONG NEWCOMERS AND ADULTS EAGER TO IMPROVE THEMSELVES THROUGH EDUCATION. CAMERON HOUSE, A COMMUNITY CENTER IN CHINATOWN, ALONG WITH OTHER AGENCIES AND CHURCHES, HAVE FOR DECADES PROVIDED CLASSROOM SPACE TO ACCOMMODATE THE GROWING NEEDS OF THE COMMUNITY COLLEGE PROGRAM.

AT BEST, THIS APPROACH COMPROMISES CONSISTENCY AND QUALITY FOR LEARNING BECAUSE OF THE CONSTRAINTS PLACED BY THE USE OF SHARED SPACE, EQUIPMENT, AND OFTEN SUPPLIES.

CLEARLY, THE BURDEN OF MAINTAINING A DECENT ENVIRONMENT FOR LEARNING AT THAT LEVEL CANNOT BE FOREVER BORNE BY SMALL NONPROFIT AGENCIES. IT IS TIME TO MOVE FROM THESE TEMPORARY STOPGAP MEASURES TO A MORE REALISTIC AND PERMANENT SOLUTION. THUS, WE ENTHUSIASTICALLY SUPPORT THE EFFORT OF THE SAN FRANCISCO COMMUNITY

10 COLLEGE BOARD TO ESTABLISH A SITE IN CHINATOWN.

ANY OPPOSITION TO THIS EFFORT MUST BE WEIGHED CAREFULLY AGAINST THE LONG-TERM ECONOMIC AND SOCIAL BENEFITS WHICH WILL RESULT FROM HAVING A BETTER EDUCATED COMMUNITY.

WE JOIN THE MANY WHO ENDORSE THIS PROJECT AND URGE THAT EVERY EFFORT BE MADE TO IMPLEMENT THIS PROJECT.

SINCERELY HARRY CHUCK. THANK YOU."

TRUSTEE RODIS: THANK YOU. NORMAN YEE WILL BE FOLLOWED BY LARRY MOCK.

11 MR. YEE: GOOD EVENING. I'M NORMAN YEE, EXECUTIVE DIRECTOR OF YEE CHILDREN SERVICES. WE HAVE FOUR CHILD-CARE CENTERS AROUND THIS AREA AND A FAMILY CENTER AND A BEACON CENTER. WE SEE LITERALLY THOUSANDS OF PEOPLE EVERY YEAR THAT COME INTO OUR FAMILY CENTER REQUESTING CHILD CARE.

LITERALLY, HUNDREDS OF THESE PEOPLE, WHEN WE ASK THEM, "WHAT DO YOU NEED CHILD CARE FOR?" "I REALLY WANT TO LEARN ENGLISH. I REALLY WANT TO TAKE EDUCATIONAL CLASSES AT CITY COLLEGE AT FILBERT STREET, AND YET WE CAN'T

FIND CHILD CARE."

I REALLY WOULD LIKE TO URGE THE COMMISSION TO SUPPORT THE BUILDING OF THE NEW CAMPUS FOR THE CHINATOWN CAMPUS, BECAUSE WHAT IT'S GOING TO PROVIDE IS NOT ONLY THE CHILD CARE FOR THE PARENTS, BUT I ALSO SEE A LOT OF OPPORTUNITIES FOR CITY COLLEGE TO CREATE, FOR INSTANCE, A LAB SCHOOL SITUATION FOR THAT CHILD CARE IN WHICH, AS YOU MAY OR MAY NOT KNOW, THERE'S VERY FEW. SO WE REALLY NEED A LOT OF NEW TEACHERS OUT THERE AS THE CHILD-CARE FIELD IS EXPANDING.

11

THIS WILL GIVE CITY COLLEGE AN OPPORTUNITY TO FULFILL THE NEEDS IN TERMS OF THE FEW. I WOULD ALSO LIKE TO SAY THAT WITH THE LIBRARY THAT'S GOING TO BE INCORPORATED INTO THIS BUILDING, IT'S GOING TO GIVE PARENTS A LOT OF OPPORTUNITIES TO OR RESOURCES TO BOOKS AND OTHER THINGS THAT THEY DON'T REALLY HAVE RIGHT NOW.

SO, AGAIN, WITHOUT SAYING MUCH MORE BECAUSE IT SEEMS THAT OTHER SPEAKERS HAVE COVERED OTHER ISSUES IN SUPPORT WITH WHAT I'VE SAID SO FAR, PLEASE, YOU KNOW, SUPPORT THIS BUILDING WITH NO HESITATION. THANK YOU.

TRUSTEE RODIS: THANK YOU.

LARRY MOCK WILL BE FOLLOWED BY WAI CHING KWAN.

MR. MOCK: MY NAME IS LARRY MOCK. I'M AN ARCHITECT WITH MOCK-WALLACE ARCHITECTS. THIS IS MY 20TH YEAR OF PRACTICING IN SAN FRANCISCO REMODELING BUILDINGS RIGHT HERE IN THE CITY.

IN 1998, I WAS APPOINTED BY MAJOR ART AGNOS TO BE A MEMBER OF THE SAN FRANCISCO HANDICAP ACCESS OF HILLS BOARD. I SERVED ON THAT BOARD FOR FOUR YEARS.

12

LET ME EXPLAIN WHAT THE FUNCTION OF THE BOARD IS. THAT BOARD IS APPOINTED AS AN ADVISORY BOARD BY THE DEPARTMENT OF PUBLIC WORKS. ANY PERSON WHO WANTS TO REMODEL A BUILDING IN SAN FRANCISCO MUST MEET THE STATE ACCESS CODES, AND IF FOR SOME REASON THEY FEEL THEY'RE UNABLE, THEY CAN APPLY FOR AN EXEMPTION FROM THE ACCESS APPEALS BOARDS. IT'S OUR FUNCTION ON THE BOARD TO JUDGE THE MERITS AND EITHER GRANT EXEMPTION OR NOT GRANT THE EXEMPTION WHICH WOULD MEAN THEY NEED TO COMPLY TO THE CODES.

SO I'M HERE TONIGHT TODAY TO GIVE YOU A PERSPECTIVE OF REMODELING BUILDINGS FOR

PUBLIC ACCESS IN SAN FRANCISCO, AND PARTICULARLY, FOR HISTORIC BUILDINGS. IN THE FOUR YEARS THAT I WAS ON THE BOARD, I SAW MANY CREATIVE DESIGNS TO TRY TO ACHIEVE ACCESS.

PARTICULARLY FOR PUBLIC BUILDINGS AND PARTICULARLY FOR A BUILDING LIKE CITY COLLEGE, WE REALLY DO NEED THE HIGHEST ACCESS POSSIBLE. EVEN THOUGH IT'S A HISTORIC BUILDING, THERE SHOULD BE NO COMPROMISE, BECAUSE THIS BUILDING IS NOT A MUSEUM. WE CAN'T AFFORD TO TURN SAN FRANCISCO INTO A MUSEUM OF OLD BUILDINGS BECAUSE IT DOESN'T SERVE THE PEOPLE.

UNLESS WE HAVE THE VITAL -- THE VITALITY OF THE BUILDING, WE AREN'T SUCCEEDING IN OUR MISSION. BUT LET ME GIVE YOU A FEW POINTS OF PERSPECTIVE ABOUT THE BUILDING.

THE BUILDING, FIRST OF ALL, WE TALK ABOUT THE MOST CRITICAL THING, AND ACCESS IS PATH OF TRAVEL. PATH OF TRAVEL MEANS THAT YOU MUST BE ABLE, FROM THE SIDEWALK, BE ABLE TO ENTER THE BUILDING AND TO GO TO ALL PARTS OF THE BUILDING. WHETHER YOU'RE A STUDENT, YOU'RE A STAFF MEMBER, A VISITOR, A TOURIST, OR WHATEVER, YOU MUST BE ABLE TO GET TO ALL PARTS OF THE BUILDING.

AS A FIRST SPEAKER SAID, IN ORDER TO DO THAT, IF THE ENTRY IS NOT AT STREET LEVEL, THEN YOU MUST DEAL WITH RAMPS, LIFTS, ELEVATORS, WHAT HAVE YOU. THE NEED TO PROVIDE RAMPS OF SUFFICIENT LENGTH TO MEET THE CODES BEGINS TO BECOME -- BEGINS TO TAKE A GREAT DEAL OF SPACE. THE FOOTPRINT -- THE FOOTPRINT OF THIS BUILDING, THE COLOMBO BUILDING, IS RELATIVELY SMALL. IN ORDER TO PUT RAMPS IN THERE, YOU'RE GOING TO START EATING UP ALL THE USABLE SPACE.

THE SECOND ASPECT OF A PATH OF TRAVEL, OF COURSE, IS AN ELEVATOR. WITHOUT AN ELEVATOR, A PERSON WOULDN'T BE ABLE TO GET TO THE SECOND FLOOR, AND WE WOULD BE DENYING ACCESS TO DISABLED PEOPLE. IT'S IMPOSSIBLE TO PUT AN ELEVATOR IN WITHOUT PUTTING A BIG CHUNK, A BIG CORE, IN ORDER TO BUILD THE SIZE OF THE ELEVATOR THAT'S NEEDED FOR ACCESS.

THE STAIRS THAT ARE THERE DON'T COMPLY WITH THE CURRENT ACCESS. IF YOU START TEARING APART AND GUTTING THE BUILDING JUST TO PROVIDE THE ACCESS, YOU MAY TAKE UP 25 PERCENT OF THE SPACE JUST TO COMPLY. WHAT HAVE YOU GOT? WHAT HAVE YOU OBTAINED WHEN YOU'VE DONE

THIS? YOU HAVE A BUILDING THAT'S BEEN GUTTED AND HAS LOST ITS SOUL. IT DOESN'T FUNCTION FOR WHAT YOU NEED, AND YOU HAVE SOMETHING THAT'S JUST NOT USABLE.

12 SO I URGE YOU: DON'T HANG ON TO THE PAST. LOOK TO THE FUTURE. START WITH A CLEAN SLATE. THE COLOMBO BUILDING HAS LIVED ITS PURPOSE. IT CAN'T MEET THE PURPOSE OF AN EDUCATIONAL FACILITY. I URGE YOU TO MOVE FORWARD. THANK YOU.

TRUSTEE RODIS: WAI CHING KWAN WILL BE FOLLOWED BY RICHARD OW.

MS. CHING KWAN: GOOD EVENING. MY NAME IS WAI CHING KWAN WITH THE CHINATOWN COMMUNITY DEVELOPMENT CENTER. I HAVE A LETTER HERE FROM OUR EXECUTIVE DIRECTOR GORDON CHIN, WHO CANNOT BE HERE TO THE TODAY.

13 "THE CHINATOWN COMMUNITY DEVELOPMENT CENTER WOULD LIKE TO EXPRESS OUR SUPPORT FOR THE PROPOSED CITY COLLEGE OF SAN FRANCISCO CHINATOWN/NORTH BEACH ON THE CORNER OF WASHINGTON AND COLUMBUS STREETS. THE CITY COLLEGE CHINATOWN/NORTH BEACH CAMPUS IS AN IMPORTANT INSTITUTION FOR OUR COMMUNITY PROVIDING ACCESS TO AND OPPORTUNITIES FOR EDUCATIONAL ADVANCEMENT TO MANY OF THE IMMIGRANT AND LOW-INCOME RESIDENTS IN THE CHINATOWN/NORTH BEACH AREA.

13 WE'RE EXCITED ABOUT THE PROPOSED NEW CAMPUS WHICH WOULD OFFER STATE-OF-START COMPUTER TECHNOLOGY AND INCREASE NUMBER OF ESL COURSES AND MORE VOCATIONAL TRAINING OPPORTUNITIES. IN ADDITION, WE ANTICIPATE THAT A NEW CAMPUS WITH ITS LIBRARY, AUDITORIUM, AND MULTIPURPOSE ROOMS WILL BE AVAILABLE NOT ONLY TO STUDENTS AND FACULTY, BUT TO THE COMMUNITY AT LARGE FOR PUBLIC MEETINGS AND COMMUNITY EVENTS.

BY EXPANDING ITS CLASS OFFERINGS AND JOB TRAINING PROGRAMS AND PROVIDING CHILD CARE AND ACCESSIBILITY TO PEOPLE WITH DISABILITIES, THE PROPOSED NEW CAMPUS CLOSE TO PUBLIC TRANSPORTATION WILL BE ABLE TO SERVE A LARGER POPULATION AND MEET THE GROWING NEEDS OF THE CHINATOWN

13 COMMUNITY.

14 WE APPLAUD THE CITY COLLEGE BOARD OF TRUSTEES' DECISION TO ESTABLISH A PERMANENT CAMPUS IN CHINATOWN. WHILE THE NEED FOR MORE EDUCATIONAL AND VOCATIONAL RESOURCES FOR OUR COMMUNITY IS INDEED GREAT, WE TRUST THAT THE BOARD IS ALSO MINDFUL OF AFFORDABLE HOUSING, GIVEN A SHORT SUPPLY AND IMMENSE NEED, IS OF THE OUTMOST IMPORTANCE TO THE CHINATOWN COMMUNITY.

15 WITH THE DEMOLITION OF 21 UNITS OF HOUSING AT THE FONG BUILDING BEING PROPOSED, WE DO EXPECT THE BOARD TO HAVE SERIOUSLY ADD INCORPORATING AFFORDABLE REPLACING HOUSING EITHER ON SITE OR OFF SITE WITHIN CHINATOWN/NORTH BEACH AREA.

16 IN ADDITION, GIVEN THE DIFFICULTIES OF FINDING AFFORDABLE HOUSING, CITY COLLEGE WOULD NEED TO PROVIDE ADEQUATELY RELOCATION ASSISTANCE TO THE FONG BUILDING EXISTING RESIDENTIAL TENANTS WHO WE BELIEVE ARE MOSTLY LOW INCOME.

16 SUCH PROVISIONS ARE NECESSARY IN ORDER TO ADEQUATELY MITIGATE THE LOSS OF AFFORDABLE HOUSING TO THE COMMUNITY AND THE SUBSEQUENT DISPLACEMENT OF LOW-INCOME TENANTS.

WE LOOK FORWARD TO CONTINUED DISCUSSIONS AND WORKING CLOSELY WITH CITY COLLEGE AND THE COMMUNITY TO ACHIEVE A SUCCESSFUL NEW CHINATOWN/NORTH BEACH CAMPUS. THANK YOU."

TRUSTEE RODIS: THANK YOU.

RICHARD OW WILL BE FOLLOWED BY SUSAN WANG.

17 MR. OW: PRESIDENT RODIS AND MEMBERS OF THE BOARD. MY NAME IS RICHARD OW. WHEN I RETIRED FROM THE POST OFFICE, LOTS OF MY COWORKERS, PAT MY BACK, "YOU MAKE IT, RICHARD. YOU MAKE IT, RICHARD" .

YES, I DID: WENT TO WORK ON TIME AND I DID PUT IN HARD DAY'S WORK AND GET ONE GOOD DAY OF PAY. AND I ALSO HAVE MY SHARE OF DOG BITES, BUT I HAVE TO ALSO THANK THE CITY COLLEGE OR THE COMMUNITY COLLEGE TO BRING ME

ALONG.

MY FIRST JOB WAS DELIVER MAIL IN THE HUNTERS POINT, AND LATER ON, I WAS ASSIGNED TO TAKE CARE OF THE ARMY AND NAVY MAIL. AND LATER ON, I WAS TOLD TO MAKE SOME ANNOUNCEMENT TO A MICROPHONE, AND LOTS OF MY CO-WORKER TELL ME, "HEY, RICHARD, YOU TALK TOO LOUD. WE CANNOT UNDERSTAND YOU."

17

WELL, I DO HAVE A LOUD VOICE, BUT MY ENUNCIATION WAS VERY POOR. SO I WENT TO A SPEECH CLASS IN THE COMMUNITY COLLEGE, AND I DID NOT GO THERE ONE TIME. I GO THERE TWO TIMES AND FINALLY, PEOPLE TELL ME, "RICHARD, WE CAN NOW HEAR YOU LOUD AND CLEAR."

AND LATER ON, I WAS ASSIGNED TO TAKE CARE OF THE CUSTOMER COMPLAINTS, AND I'M IN TROUBLE. THEN I WENT TO CITY COLLEGE. I TOOK SOME COURSES IN HUMAN RELATIONS AND HOW TO TALK PERSON TO PERSON AND IN A GROUP DYNAMICS. IT HELPED ME ALL THE WAY THROUGH.

SO WHAT'S GOOD FOR ME I WANT TO BE GOOD FOR ALL MY SISTERS AND BROTHERS IN THE BACK OF ME. THEY ARE STUDYING VERY HARD TO TRY TO GET A GOOD JOB, AND I WANT YOU TO BUILD A NEW CAMPUS, ESPECIALLY WITH CHILD CARE.

MANY OF OUR YOUNGER BROTHERS AND SISTERS ARE HAVING CHILDREN. LET THEM STUDY WITH THEIR HEARTS EASED SO THAT THEY KNOW THEIR CHILD ARE BEING TAKING CARE OF IN THE SAME BUILDING. THAT'S A GOOD BEGINNING.

17

NOW, WE SAY JOBS AND JOBS AND JOBS. HOW ARE YOU GOING TO GET THE FIRST JOB WITHOUT TRAINING? AND AFTER YOU GET TO THE FIRST JOB, YOU STILL NEED TRAINING, BECAUSE YOUR EMPLOYER IS NOT GOING TO BE SATISFIED WITH WHAT YOU DO.

SO ALLOW THEM TO ESTABLISH SATURDAY TRAINING AND NIGHTTIME TRAINING SO THAT YOU WILL HELP THE WORKER ALONG. ONCE THEY GO TO WORK, THEY PAY TAXES AND MAYBE LATER ON, THEY'RE GOING TO RUN FOR COMMUNITY COLLEGE BOARD. THANK YOU.

TRUSTEE RODIS: THANK YOU.

SUSAN WANG WILL BE FOLLOWED BY FAYE LEE.

18

MS. WANG: GOOD EVENING, EVERYONE. I'M SUSAN WANG. I WAS THE STUDENT COUNCIL PRESIDENT OF CHINATOWN NORTH BEACH.

WE NEED A NEW CAMPUS BADLY. FOR MY EXAMPLE, LAST SEMESTER I TOOK TWO COURSES. ONE AT FILBERT CAMPUS AND ONE ST. MARY'S SCHOOL.

AND THAT CLASS WAS AT 5:15 AFTER CLASS OVER ABOUT 6:20. THEN I HAD TO RUSH TO THE ST. MARY'S SCHOOL, TAKE A 6:30 DISTANCE LEARNING CLASS EVERY TUESDAY.

SO THAT NIGHT, EVERY TUESDAY NIGHT, MY STOMACH HURT ME VERY BAD, BECAUSE I HAD TO RUSH, EAT MY DINNER IN THE CAR. AND I ALSO HAD TO BEG MY HUSBAND TO TAKE ME TO CLASS FROM THE FILBERT CAMPUS TO ST. MARY'S SCHOOL. THAT WAS LAST SEMESTER. I FEEL MY ENERGY IS DRAINED AWAY.

18 SO I HOPE WE HAVE A NEW CAMPUS, AND IT PROVIDES ALL THE CLASSES WE NEED. WE DON'T NEED TO RUSH FROM THIS CAMPUS TO ANOTHER CAMPUS. I KNOW MANY, MANY STUDENTS THAT DO LIKE I DID. SO I JUST URGE YOU ALL THE PEOPLE TO SUPPORT THE PROJECT.

WE NEED A NEW CAMPUS, AND ALSO CONSIDER THE FILBERT CAMPUS THE REST ROOM IS SO SMALL BECAUSE THAT FITS JUST FOR KIDS, NOT FOR ADULTS. SO WHEN WE CARRY OUR SCHOOL BAG, OUR HANDBAG, WE HAVE SQUEEZE INTO THE TOILET ROOMS. AND SOMETIMES THE FLOOR IS SO DIRTY. WE ALSO HAVE TO PUT ALL OUR STUFF ON THE FLOOR. YOU THINK ABOUT THESE THINGS. SO WE

WANT TO HAVE APPROPRIATE REST ROOM FOR ALL THE STUDENTS THAT USE IT.

AND FOR THE STUDENTS COUNSELOR, WE DON'T HAVE ENOUGH SPACE, DON'T HAVE, LIKE, CLASSROOMS FOR STUDENTS (INAUDIBLE) JOBS, EVEN PROVIDE THE STUDENTS A GOOD SERVICE.

SOME THE NEW STUDENTS THAT COME TO CAMPUS, THEY NEED MORE INFORMATION, BUT WE DON'T HAVE A FIXED SITE PROVIDING THEM THAT INFORMATION. SO (INAUDIBLE) NEW STUDENTS COME TO THE CAMPUS, THEY DON'T KNOW WHO THEY CAN ASK FOR, WHO CAN PROVIDE THEM A ADEQUATE SERVICE. 18

SO WE REALLY NEED A TO BUILD A NEW CAMPUS. I URGE EVERYONE CAN SUPPORT THIS PROJECT. WE WANT OUR DREAMS COME TRUE. THANK YOU.

PRESIDENT RODIS: MS. FAYE LEE WILL BE FOLLOWED BY LINDA WANG.

MS. LEE: GOOD EVENING. MY NAME IS FAYE LEE. I REPRESENT SAN FRANCISCO LARGE CHINESE-AMERICAN CITIZENS ALLIANCE, CACA, FOR SHORT. CACA HAS A HUNDRED THREE YEARS' HISTORY OF COMMITMENT TO CIVIL RIGHTS AND COMMUNITY SERVICE. 19

IN SAN FRANCISCO (INAUDIBLE) JUST

CELEBRATED ITS 86TH ANNIVERSARY. WE HAVE BEEN INVOLVED IN ALMOST EVERY BATTLE TO BRING CHANGES AND NEW IMPROVEMENTS TO SAN FRANCISCO CHINATOWN.

I'M HERE TONIGHT TO GIVE OUR WHOLEHEARTEDLY SUPPORT TO THE NEW CAMPUS. IT IS LONG OVERDUE. CHINATOWN NORTH BEACH DESPERATELY NEEDS A LARGER CAMPUS BECAUSE THE CURRENT ONE IS INADEQUATE.

MANY, MANY OF OUR RESIDENTS ARE IMMIGRANTS. THEY NEED TO BE IN ESL CLASSES, 19 CITIZENSHIP CLASSES WITHOUT WAITING. THEY ALSO NEED MORE VOCATIONAL OPPORTUNITIES. THEY ALSO NEED TO BE ABLE TO GO TO CLASSES WITHOUT TRAVELING OUT OF THEIR COMMUNITY BECAUSE MANY OF THEM WORK OR THEY HAVE TO TAKE CARE OF YOUNG CHILDREN.

NOW, THE NEW CAMPUS WILL HAVE A DAY-CARE CENTER AND WILL BE ACCESSIBLE TO PEOPLE WITH HANDICAP AND ALSO WILL INCREASE THE PROXIMITY OF PUBLIC TRANSPORTATION.

IF IT IS BUILT, IT WILL GO A LONG WAY IN MEETING THE NEEDS OF THE SERVED COMMUNITY. SO WE URGE THE CITY COLLEGE BOARD OF TRUSTEES AND THE COMMUNITY TO, PLEASE, WORK TOGETHER TO

MAKE THIS A REALITY AS SOON AS POSSIBLE. 19

PRESIDENT RODIS: LINDA WANG WILL BE FOLLOWED BY TERESA WU.

MS. WANG: GOOD EVENING. THANK YOU FOR THE OPPORTUNITY TO SPEAK TO YOU. I AM LINDA WANG. I CHAIR THE INTERNATIONAL HOTEL CITIZENS ADVISORY COMMITTEE, WHICH HAS BEEN IN EXISTENCE NOW FOR 20 YEARS. I ALSO AM THE PRESIDENT OF THE KEARNEY STREET HOUSING CORPORATION, WHICH IS A COSPONSOR, ALONG WITH THE CHINATOWN COMMUNITY DEVELOPMENT CENTER, FOR THE SENIOR HOUSING THAT IS TO BE BUILT ON THE OLD ^ I HOTEL SITE. 20

I WOULD LIKE FIRST TO EXPRESS MY APPRECIATION FOR YOUR CONSIDERING THE COLUMBUS BUILDING SITE, ALONG WITH THE ^ PAUL FONG SITE FOR BUILDING THIS NEW FACILITY FOR, BASICALLY, A TREMENDOUS SERVICE TO OUR COMMUNITY. BUT BEFORE I GET INTO THAT, I WOULD LIKE TO SAY SOMETHING PUBLICLY THAT WE HAVE NOT ACKNOWLEDGED AND THAT IS THAT THE ^ I HOTEL CITIZENS ADVISORY COMMITTEE ACTUALLY HAS WORKED AND STRUGGLED FOR 20 YEARS TO DEVELOP THAT SITE AT KEARNEY AND JACKSON STREETS THAT I'M SURE YOU'RE ALL AWARE OF -- IT'S THAT HOLE IN THE

20 GROUND THAT HAS BEEN A HOLE IN THE GROUND FOR OVER 20 YEARS NOW -- AND HAS WORKED WITH PAN-MAGNA, THE PAN-MAGNA CORPORATION, WHICH OWNED THAT SITE AS WELL AS THE COLUMBUS BUILDING SITE.

WE HAVE WORKED TO TRY TO FIGURE OUT A WAY OF DEVELOPING THE SITE AND BRINGING BACK -- TO BRING BACK HOUSING ON THE ˆ I HOTEL SITE.

IT LOOKS NOW LIKE THE HOUSING IS GOING TO HAPPEN. WE ARE VERY PLEASED THAT PAN-MAGNA HAS CHOSEN TO SELL ITS PROPERTY ON THE COLUMBUS BUILDING SITE TO THE COMMUNITY COLLEGE DISTRICT. IT FEELS LIKE NOT ONLY IS THERE SOMETHING WONDERFUL ABOUT TO HAPPEN AGAIN ON THE ˆ I HOTEL SITE, BUT THAT PAN-MAGNA HAS CHOSEN TO ADD THE COLUMBUS BUILDING SITE TO PROVIDE AN EVEN GREATER COMMUNITY SERVICE. SO WE WANT TO ACKNOWLEDGE THAT DECISION.

21 THE COLUMBUS BUILDING SITE, I WOULD REFER YOU TO THE LANDMARKS BOARD DECISION IN LATE 1996. ANYWAY, THEY CONSIDERED THE COLUMBUS BUILDING SITE AND ACTUALLY DID NOT GIVE IT A HIGH GRADE AS A HISTORIC LANDMARK. WE UNDERSTAND THERE ARE PRESERVATIONIST GROUPS WHO WOULD LIKE TO SEE THE PRESERVATION OF THAT

BUILDING, AND AS A RESULT, YOU HAVE A NUMBER OF SPEAKERS WHO ARE ADDRESSING ISSUES OF WHAT THAT WOULD MEAN IF THAT BUILDING WERE PRESERVED.

THEY HAVE ALSO FILED A SUIT IN FEDERAL COURT TO TRY TO PRESERVE THE BUILDING AND HAVE DONE THEIR VERY BEST AND USED EVERY MEANS AT THEIR DISPOSAL TO SEE THAT THAT HAPPENS, AND, I THINK, TO SEE THAT THE HOUSING NOT BE BUILT.

22 I WOULD LIKE TO MAKE VERY PUBLIC THAT WE WILL PREVAIL. THERE WILL BE HOUSING AGAIN ON THE ˆ I HOTEL SITE, AND I SURELY HOPE WE WILL JOIN WITH YOU TO MAKE SURE THAT THE COMMUNITY COLLEGE DISTRICT IS ABLE TO CREATE THE FACILITY THAT YOU HAVE PROPOSED TO MAKE IT POSSIBLE FOR OUR COMMUNITY TO HAVE MUCH BETTER EDUCATIONAL OPPORTUNITIES.

23 WITH THAT, IN RELATION TO THE HOUSING THAT WILL BE DONE AWAY WITH IN THE PAUL FONG BUILDING, IT IS HEARTENING TO HEAR YOUR OPENING STATEMENT ABOUT ASSISTANCE TO THE CURRENT TENANTS, AND I'M CONFIDENT THAT IF THERE IS ANY WAY THAT YOU ARE ABLE TO HELP IN REPLACING THAT HOUSING STOCK THAT YOU WILL DO EVERYTHING IN YOUR MEANS TO DO SO.

TRUSTEE RODIS: THANK YOU. TERESA WU WILL BE FOLLOWED BY MARSHA ROSEN.

MS. WU: GOOD EVENING, LADIES AND GENTLEMEN. I'M REPRESENTING THE CHINESE NEWCOMERS SERVICE CENTER. I'M THE EXECUTIVE DIRECTOR OF CHINESE NEWCOMER SERVICE CENTER.

FOR THE CHINESE NEWCOMERS, WE DO HAVE A DEFINITION. WHENEVER THESE NEWCOMERS LEARN HOW TO MANAGE THEIR ENGLISH FOR THEIR DAILY LIFE IS THE TIME WHEN WE DON'T CONSIDER THEM AS A NEWCOMER, BECAUSE THEY WILL NOT CONTINUE TO COME TO OUR CENTER TO REQUEST HELP.

EVERY YEAR WE HELP EVERY AVERAGE ABOUT 30,000 TIMES SERVICE WE OFFER FOR THEM. ON THE 30,000 SERVICE, ABOUT 70 PERCENT WAS COMING LOOKING FOR THE JOB. AND THEN THE JOB, UNFORTUNATELY, WE CAN HELP THEM TO FIND THROUGH WORKING WITH EDD STAFF, WHO IS LOCATED IN OUR CENTER.

EACH YEAR WE CAN ONLY FIND JOB AS ENTRANCE-LEVEL JOBS FOR THEM, ALTHOUGH SO MANY THESE NEWCOMERS THEIR EDUCATIONAL LEVEL IN THEIR OWN COUNTRY IS MUCH HIGHER EDUCATED PEOPLE, BUT LACK OF LANGUAGE SKILL, THEY HAVE TO TAKE ANY JOB WITHOUT REQUEST FOR LANGUAGE

SKILLS.

THEN ABOUT 80 PERCENT OF PEOPLE CAME TO OUR CENTER REQUEST FOR HELP, THEY NEED LANGUAGE TRAINING, MORE LANGUAGE TRAININGS. OFTEN THEY COME BACK WHEN WE REFER THEM TO CITY COLLEGE, COMMUNITY COLLEGE CHINATOWN CAMPUS, OR OTHER PLACES. BECAUSE OF THEIR SHORT LANGUAGE SKILL, THEY ARE, OF COURSE, LOOKING FOR THE PLACE MORE FAMILIAR TO THEM, WHICH IS WHY CHINATOWN OFTEN TO BE THE FIRST CONSIDERATION.

UNFORTUNATELY, THE WAITING LIST IS ALWAYS SO GREAT BECAUSE THE SCHOOL CANNOT TAKE THEM AS SOON AS POSSIBLE. AND THEN WE ARE STILL LOOKING FOR A LONG TIME FOR THIS CAMPUS CAN BE ENLARGED, CAN BE MORE ADVANCED WITH ALL THE JOB TRAININGS.

HELP THIS EDUCATED PEOPLE CAN GET BETTER LIVES AND THEN CAN ADJUST IN THIS COUNTRY TO BE NICE CITIZENS AND THEN CAN EARN THEIR FAIR INCOME.

SO I'M HERE TO ASK FOR THIS CAMPUS. WE ARE SO LOOKING FORWARD TO HAVE A NEW CAMPUS THAT WILL BENEFIT ALL THESE PEOPLE. THANK YOU.

TRUSTEE RODIS: MARSHA ROSEN TO BE

FOLLOWED BY MS. MAN MEI CHEUNOY.

MS. ROSEN: GOOD EVENING, MR. PRESIDENT, MADAM CHANCELLOR, MEMBERS OF THE BOARD OF TRUSTEES. I'M MARSHA ROSEN, DIRECTOR OF THE MAYOR'S OFFICE OF HOUSING.

25 MAYOR WILLIE BROWN ASKED ME TO COME
HERE TONIGHT TO CONVEY TWO MESSAGES FROM HIM.
ONE, HIS VERY STRONG SUPPORT FOR A NEW
CHINATOWN CAMPUS WITH THE FACILITIES THAT THE
EIR HAS DOCUMENTED. BUT, SECONDLY, A VERY
SERIOUS CONCERN ABOUT ANY PUBLIC AGENCY
26 PROPOSING A PROJECT WHICH INCLUDES THE
DEMOLITION OF HOUSING, WHICH IS IN VIOLATION OF
CITY LAW AND CITY POLICY.

I WAS HEARTENED TO HEAR,
MR. PRESIDENT, SPEAK AT THE BEGINNING OF THE
MEETING ABOUT THE CONCERN FOR REPLACEMENT FOR
THE TENANTS, BUT I DO WANT TO POINT OUT THAT
THE TENANTS' RIGHTS TO RELOCATION BENEFITS ARE
27 PROBABLY GOVERNED BY STATE RELOCATION LAW, AND
THAT IS A SEPARATE MATTER FROM THE REPLACEMENT
OF THE DESPERATELY NEEDED AFFORDABLE HOUSING.

THIS IS PARTICULARLY POIGNANT TO SEE
THE LOSS OF 21 UNITS OF HOUSING ADJACENT TO A
PARCEL WHERE PEOPLE WERE EVICTED IN 1977 AND

THE BUILDING DEMOLISHED IN 1979, AND WE ARE
ONLY NOW HOPING TO BREAK GROUND IN 1998 TO
BEGIN THE REPLACEMENT OF THAT HOUSING. 27

SO MAYOR BROWN ASKED ME TO CONVEY HIS FEELINGS ABOUT THAT TO YOU THIS EVENING. THANK YOU VERY MUCH.

TRUSTEE RODIS: THANK YOU.

WE WILL TAKE A SHORT BREAK. WE HAVE A COURT REPORTER WHO NEEDS TO REST HER HANDS. TEN MINUTES.

CAN SOMEONE TRANSLATE IN CHINESE THAT WE WILL HAVE A TEN-MINUTE BREAK?

MEMBER OF THE AUDIENCE: (SPEAKING CHINESE.)

(RECESS TAKEN.)

PRESIDENT RODIS: BEFORE WE START, THERE ARE A NUMBER OF PEOPLE HERE WHO PROBABLY ARE NOT ABLE TO EXPRESS THEMSELVES WELL IN ENGLISH BUT WOULD LIKE TO EXPRESS THEIR ISSUES AND CONCERNS REGARDING THIS MATTER.

SO I'D LIKE TO ASK MS. PO TO INTERPRET IF SHE COULD VOLUNTEER TO INTERPRET FOR ANYONE WHO WOULD LIKE TO SPEAK IN CHINESE.

COULD YOU, PLEASE, SAY THAT.

MEMBER OF THE AUDIENCE: (SPEAKING

CHINESE.)

PRESIDENT RODIS: AT THIS TIME, I'D LIKE TO JUST TAKE IT OUT OF ORDER FOR A BIT AND CALL ON A FORMER COMMUNITY COLLEGE MEMBER, THE CURRENT ASSESSOR OF THE CITY AND COUNTY OF SAN FRANCISCO: DR. DORIS WARD.

DR. WARD: THANK YOU VERY MUCH. THANK YOU VERY MUCH, PRESIDENT RODIS, CHANCELLOR ANDERSON, AND MEMBERS OF THE BOARD, AND OLD FRIEND, RON LEE. IT'S GOOD SEEING YOU. IT BRINGS BACK MY DAYS WHEN I WAS A MEMBER OF THIS BOARD.

LET ME JUST TELL YOU, PEOPLE: I'VE BEEN A MEMBER OF THIS BOARD AND ALSO THE BOARD OF SUPERVISORS, AND I ENJOYED THIS BOARD MUCH BETTER. I REALLY DID.

28 I AM DELIGHTED TO BE HERE TONIGHT TO TALK THE ABOUT THE IMPORTANCE OF A CENTER HERE IN CHINATOWN. WHEN I WAS ON THE BOARD, I WAS VERY, VERY SUPPORTIVE OF THE CHINESE COMMUNITY AND THE THINGS THAT THEY WANTED TO DO THAT WOULD IMPROVE THE QUALITY OF LIFE FOR THEMSELVES: EDUCATIONALLY, ECONOMICALLY AND SOCIALLY.

I'M HERE TODAY AS A FORMER BOARD

MEMBER, AS A RESIDENT OF THIS COMMUNITY, SAYING THAT A COMMUNITY COLLEGE IN THIS NEIGHBORHOOD NEEDS TO BE BUILT. THE ONE THAT YOU HAVE NOW YOUR LEASE HAS ENDED, AND IT IS INADEQUATE TO HOUSE THAT KIND OF PROGRAMS AND THE KINDS OF NEEDS THAT THE PEOPLE IN THIS COMMUNITY NEED. 28

A NICE NEW FACILITY WILL BE ABSOLUTELY WHAT THEY NEED. I SUPPORT THAT 100 PERCENT. I ONLY HAVE ONE REGRET THAT I'M NOT ON THE BOARD SO THAT I CAN CAST MY VOTE FOR THE NEW BUILDING, BUT I DO THINK THAT IT'S VERY IMPORTANT AND THANK YOU VERY MUCH.

PRESIDENT RODIS: THANK YOU.

MS. DAVID FAT LING WANG TO BE FOLLOWED BY BELINDA KAN LEE.

MR. LING WANG: (SPEAKING IN NATIVE LANGUAGE.)

TRANSLATOR: HI. MY NAME IS DAVID. I'M A STUDENT OF CITY COLLEGE. AS WE ALL KNOW, SAN FRANCISCO IS A BEAUTIFUL CITY AND IS WELL-KNOWN FOR ITS TOURISM. CHINATOWN IS ALSO A VERY 29 IMPORTANT TOURIST CITY. IT ATTRACTS LOTS AND LOTS OF TOURISTS COMING INTO THE CITY.

I THINK WE ALL AGREE THAT THE NEW CAMPUS IS GOING TO HELP OUR CITY AND HELP

29 CHINATOWN TO ATTRACT TOURISTS COMING TO OUR COMMUNITY. IF YOU DON'T BELIEVE IT, YOU MAY WANT TO SURVEY ALL THE TOURISTS COMING INTO CHINATOWN AND SEE IF THE NEW CAMPUS AT THE WASHINGTON AND KEARNEY STREET WILL ATTRACT TOURISM.

WE FEEL THAT THIS PROJECT IS AN EXTREMELY IMPORTANT PROJECT. PLEASE SUPPORT IT.

PRESIDENT RODIS: BELINDA KAN LEE WILL BE FOLLOWED BY SAMMI HUANG.

30 MS. KAN LEE: CHAIRMAN, MEMBERS OF THE BOARD OF TRUSTEES. MY NAME IS BE BELINDA LEE. RIGHT NOW I'M ATTENDING THE VOCATIONAL PROGRAM AT CHINATOWN/NORTH BEACH CAMPUS.

I LEARN A LOT OF SKILLS IN THIS PROGRAM. THEY ARE REALLY IMPORTANT FOR ME. I KNOW THIS IS ALSO TRUE FOR MY CLASSMATES TOO. OUR CURRENT BUILDING AT 940 FILBERT WAS BUILT AS AN ELEMENTARY SCHOOL. IT'S OLD, NOT EARTHQUAKE PROOF AND ALREADY FALLING APART.

WE REALLY NEED A LARGER REST ROOM WITH BETTER FACILITY FOR THE DISABLED, A CAFETERIA, MORE COMPUTER LABS, AND A LIBRARY FOR THE STUDENTS.

30 I THINK THAT WASHINGTON AND COLUMBUS LOCATION WILL BE GOOD FOR BOTH THE CHINESE COMMUNITIES AND THE BUSINESS COMMUNITIES. I LOOK FORWARD TO THAT TIME WHEN WE HAVE A BUILDING WITH HIGH TECH. THANK YOU.

TRUSTEE RODIS: THANK YOU.

SAMMI HUANG FOLLOWED BY ANNA YIN.

31 MS. HUANG: GOOD EVENING, LADIES AND GENTLEMEN. MY NAME IS SAMMI HUANG. I'M THE CO-PRESIDENT OF ASSOCIATED STUDENTS COUNCIL AT CHINATOWN/NORTH BEACH CAMPUS OF CITY COLLEGE.

I HAVE BEEN AT THE CHINATOWN/NORTH BEACH CAMPUS FOR SEVEN MONTHS -- IT'S NOT A LONG TIME -- BUT I REALIZE THAT THE BUILDING OF FILBERT CANNOT SATISFY THE MANY DIFFERENT NEEDS OF OUR STUDENTS.

FIRST OF ALL, OUR CURRENT BUILDING AT 940 FILBERT IS NOT SAFE ENOUGH BECAUSE IT CANNOT WITHSTAND EARTHQUAKES. THE BUILDING WAS ORIGINALLY AN ELEMENTARY SCHOOL AND NOT DESIGNED FOR ADULTS. THIS IS A PROBLEM BECAUSE THE BATHROOMS ARE TOO SMALL AND NOT ENOUGH FOR OUR ADULT STUDENTS.

THIS BUILDING IS NOT BIG ENOUGH. WE DON'T HAVE ENOUGH CLASSROOMS SO WE CAN'T EXPAND

31

THE OTHER PROGRAMS THAT INTEREST OUR STUDENTS, SUCH AS CHILD DEVELOPMENT AND TRANSITION STUDIES CLASSES.

WE DON'T HAVE ENOUGH COMPUTER EITHER. IN ADDITION, WE DON'T HAVE LUNCH FACILITIES, AN AUDITORIUM, A LIBRARY, A HEALTH CENTER, AND A CHILD-CARE CENTER. IN MY OPINION, NOTHING CAN BE MORE IMPORTANT THAN EDUCATION. ONLY WHEN WE HAVE A GOOD EDUCATION OUR SOCIETY CAN BE IMPROVED.

IF WE CAN BUILD A PERMANENT CHINATOWN/NORTH BEACH CAMPUS IN A CONVENIENT AND SAFE PLACE, THEN MORE AND MORE PEOPLE CAN GET A GOOD EDUCATION AND BENEFIT FROM THAT. IT'S GREAT FOR NOT ONLY THE PERSON WHO LIVE IN CHINATOWN AND NORTH BEACH BUT THE WHOLE SOCIETY. THANK YOU.

TRUSTEE RODIS: ANNA YIN WILL BE FOLLOWED BY KELVIN KWAN.

32

MS. YIN: GOOD EVENING, EVERYONE. MY NAME IS ANNA YIN, ONE OF THE STUDENT REPRESENTATIVES.

I WOULD LIKE TO ASK YOU TO SUPPORT THIS PROJECT TO BUILD OUR NEW CAMPUS BECAUSE I HAVE SOME REASONS. FIRST, STUDENTS REALLY NEED A LIBRARY TO STUDY. COMPARE TO OTHER CAMPUS, WE DON'T HAVE OUR LIBRARY TO LET STUDENT TO STUDY. THAT'S WHY IT'S VERY POOR -- IT'S REALLY POOR FOR STUDENTS TO STUDY.

SECOND, WE NEED BETTER COUNSELOR SERVICE BECAUSE OUR STUDENT REALLY NEED GUIDANCE. THEY NEED COUNSELOR PROVIDER, EDUCATIONAL (INAUDIBLE) SERVICE, FINANCIAL AID SERVICE, AND PERSONNEL ISSUES. THIS IS WHY WE HOPE COUNSELORS CAN HELP STUDENTS. HOWEVER, IF YOU TAKE A LOOK ON CHINATOWN/NORTH BEACH CAMPUS COUNSELING DEPARTMENT, YOU CAN FIND OUT THAT THERE IS A REALLY TINY SPACE AND THEY'RE CROWDED. 32

COUNSELORS ASSIST MANY, MANY STUDENTS EVERY DAY. THEY DON'T HAVE ANY PRIVACY. I BELIEVE EVERYONE WILL THINK PRIVACY IS VERY IMPORTANT, SO OUR STUDENTS NEED THOSE SERVICES.

THE THIRD ONE IS STUDENTS NEED THEIR OWN PLACE. FOR EXAMPLE, STUDENTS NEED A ROOM THEY USE AS A.S. COUNCIL OFFICE BECAUSE STUDENTS' VOICE NEED TO BE HEARD, AND WE NEED TO HAVE EXTRA CURRICULUM TO PREPARE US TO GO TO WORK AND GO TO OTHER PLACES.

WELL, SCHOOL IS FOR STUDENTS TO GET EDUCATION AND WELL-PREPARED TO GO TO WORK. THE MORE COMMUNITY CONTRIBUTE TO STUDENTS THE MORE STUDENTS CAN CONTRIBUTE BACK TO THE SOCIETY. THAT'S WHY WE REALLY NEED THIS NEW CAMPUS.

32 AS WE ALL KNOW, THE LEASE IS ALMOST END SO WE NEED A HOME, NOT A LEASING ANYMORE.

FINALLY, WE GOT FUNDING FROM THE STATE. THAT'S THE DREAM TO BUILD -- THE DREAM IS ALMOST FULFILLED, BUT THE PROBLEM IS SOMEONE AGAINST IT.

33 BUT TAKE A LOOK ON THE EIR WE CAN FIND THAT IT'S NOT THAT MAJOR PROBLEMS TO BUILD A NEW BUILDING.

34 SO I URGE PEOPLE TO SUPPORT THIS PROJECT AND HELP US TO GET OUR HOME, GET A NEW BUILDING TO ASSIST STUDENTS. THANK YOU VERY MUCH.

TRUSTEE RODIS: KELVIN KWAN WILL BE FOLLOWED BY VICTOR SEETO.

35 MR. KWAN: GOOD EVENING, EVERYBODY. I'M CALVIN, ONE OF THE CO-PRESIDENT OF THE ASSOCIATED STUDENTS COUNCIL AT CHINATOWN/NORTH BEACH CAMPUS. I'M STUDYING ESL AND COMPUTERS AT THIS CAMPUS, AND I WILL TRANSFER TO PHELAN CAMPUS NEXT SEMESTER.

35 THE MOST IMPORTANT CLASSES AND PROGRAMS AT THIS CAMPUS ARE ESL, CITIZENSHIP, AND BUSINESS PROGRAMS.

FOR THE STUDENTS WHO MAY WANT TO TAKE THE CREDIT CLASS, THEY WOULD LIKE TO TAKE SOME ABE CLASSES, BUT THERE IS JUST ONE ABE CLASS HERE ONE. WHY? BECAUSE OUR CAMPUS DOES NOT HAVE ENOUGH CLASSROOMS TO START OTHER PROGRAMS, AND WE NEED TO RENT OTHER BUILDINGS FOR OTHER CLASSES TOO.

BUT SOME OF THE BUILDINGS THAT WE USE ARE NOT EARTHQUAKE PROOFED, SO IT'S DANGEROUS FOR THE TEACHERS AND STUDENTS.

THERE ARE SOME PROBLEMS ABOUT THE BUILDING AT FILBERT. FOR EXAMPLE, THERE IS NO AUDITORIUM. WE NEED AN AUDITORIUM FOR EDUCATIONAL INSTRUCTION, STUDENT ASSEMBLIES, AND COMMUNITY MEETINGS.

AND THERE IS NOT ENOUGH PARKING SPACE. WE NEED SPACES FOR STUDENT PARKING, BECAUSE MANY STUDENTS SAID THAT IT WAS HARD TO PARK AROUND THE CAMPUS AT THE FILBERT SITE.

ALSO, THERE ARE NO LUNCH FACILITIES, AND MANY OF OUR STUDENTS NEED TO BRING THEIR LUNCH.

35 SO IF WE CAN BUILD OUR OWN CAMPUS, WE CAN SOLVE THESE PROBLEMS, AND THERE WILL BE MORE CLASSES FOR THE STUDENTS AND WE CAN STUDY IN A SAFE AND COMFORTABLE ENVIRONMENT TOO.

THE STUDENTS HAVE COLLECTED 3,827 SIGNATURES ON THIS PETITION TO SUPPORT THE CONSTRUCTION AT THE CORNER OF WASHINGTON STREET AND COLUMBUS AVENUE OF A MODERN, PERMANENT, CONSOLIDATED, AND EASILY ACCESSIBLE CHINATOWN/NORTH BEACH CAMPUS BUILDING THAT WILL PROVIDE FEE OR LOW-COST EDUCATION TO OVER 6,000 STUDENTS.

THE PEOPLE WHO HAVE SIGNED THE PETITIONS INCLUDE STUDENTS, NEIGHBORS, FRIENDS, AND COMMUNITY PEOPLE. THANK YOU VERY MUCH.

TRUSTEE RODIS: THANK YOU.

VICTOR SEETO AND LING-CHI WANG.

36 MR. SEETO: MY NAME IS VICTOR SEETO. I'M SPEAKING HERE ON BEHALF OF THE CHINESE AMERICAN DEMOCRATIC CLUB, ONE OF THE OLD DEMOCRATIC CLUBS IN THE CITY, AND THEY HAVE VOTED IN SUPPORT OF A CAMPUS AT THE SITE OF WASHINGTON AND COLUMBUS.

ON A PERSONAL NOTE, I'VE BEEN INVOLVED WITH THE CHINATOWN CENTER SINCE THE EARLY '70S. I WAS THE SECRETARY OF THE CHINESE ADVISORY COMMITTEE FOR THE COMMUNITY COLLEGE WHEN THE SENATE WAS ATTACHED TO THE ALEMANY CENTER. EARLY, LONG AGO, 20 YEARS, OVER 20 YEARS AGO, THERE WAS ALWAYS A NEED FOR SUCH FACILITIES AS ARTICULATED HERE.

I'M GLAD THAT THERE IS MOVEMENT TOWARDS THE CREATION OF SUCH A CENTER. IN THE PAST, IN MY ROLE AS ENDORSEMENT CHAIR OF MY POLITICAL CLUB, I KNOW THAT EACH AND EVERY ONE OF YOU HAVE EXPRESSED SOME VERY STRONG SUPPORT OF THE CREATION OF A CENTER. OUR ENDORSEMENT, I THINK, OF YOUR CANDIDACY REFLECTED THAT ASSUMPTION.

37 IN MY PRIVATE LIFE, PROFESSIONAL LIFE, I'M A DEVELOPER, AND IN THIS AREA, DEVELOPMENT SITES ARE VERY RARE. IF YOU TURN AWAY FROM THIS SITE, I DON'T KNOW WHAT TYPE OF OPPORTUNITIES THAT YOU WOULD HAVE IN TERMS OF A FOOTPRINT THAT YOU WOULD BE ABLE -- AND THE ZONING -- THAT YOU WOULD BE ABLE TO CREATE ANOTHER CENTER.

38 I THINK THAT YOU HAVE A VERY STRONG CARD TO PLAY WITH IF YOU HAVE AN IDENTIFIED SITE, AND I URGE THAT YOU SUPPORT THE CREATION

OF THE ACQUISITION OF THIS SITE.

THE CHINESE COMMUNITY IS SEEN AS THE -- CHINATOWN -- AS THE SOCIAL AND CULTURAL CENTER OF THE UNITED STATES. OVER HALF OF THE CHINESE ADULTS OF A VERY LARGE CHINESE COMMUNITY IN SAN FRANCISCO ARE IMMIGRANTS, AND THEY NEED THESE SERVICES. A CHINATOWN CAMPUS WILL SERVE GREATLY THE SOCIAL AND EDUCATIONAL NEEDS OF THIS POPULATION.

38 SINCE I HAD DESCRIBED TO YOU THE FACT THAT I'VE BEEN ASSOCIATED WITH -- AWARE OF THE NEEDS OF THE CHINATOWN COMMUNITY, CHINESE COMMUNITY, I'M SURE THAT ANYTHING BUILT WILL BE A GREAT PLAN BECAUSE WE HAVE HAD ALL THE MANY EXPERIENCES OF THE PROBLEMS AND THE NEEDS THAT WE CAN BE ABLE TO JUST ARTICULATE AND THAT WOULD ROLL RIGHT INTO A PERFECT WELL-FUNCTIONING CAMPUS. THANK YOU.

PRESIDENT RODIS: RODIS THANK YOU.

OUR LAST SPEAKER -- SECOND TO THE LAST SPEAKER -- IS PROFESSOR LING-CHI WANG, CHAIR OF THE CHINESE FOR AFFIRMATIVE ACTION.

MR. LING-CHI WANG: THANK YOU VERY MUCH,
39 PRESIDENT RODIS, AND CHANCELLOR ANDERSON, AND
MEMBERS OF THE BOARD. I'M VERY PLEASED TO BE

HERE TO SPEAK IN SUPPORT OF THE PROJECT.

EXACTLY 29 YEARS AGO, I WAS SITTING AT YOUR CHAIR HERE CHAIRING A SIMILAR MEETING ATTENDED VERY MUCH LIKE THIS, PROBABLY EVEN MORE PEOPLE FILLING OUT THE AISLES HERE. AND THE SUBJECT MATTER WAS EDUCATION, AND THE PEOPLE SITTING ON MY BOTH SIDES WERE THE SUPERINTENDENT (INAUDIBLE), INCLUDING THE (INAUDIBLE) FOR ADULT EDUCATION.

AT THAT TIME, THE COMMUNITY COLLEGE
BOARD WAS NOT CREATED YET, AND THE SCHOOL
DISTRICT WAS RUNNING THE ADULT EDUCATION. I
REMEMBER THE LEVEL THE HIGH DEGREE OF 39
FRUSTRATION ON THE PART OF THE AUDIENCE THAT
WAS THERE 29 YEARS AGO SITTING IN THIS ROOM
ABOUT THE NEED FOR ENGLISH LANGUAGE CLASSES
THAT WILL BE MORE RELEVANT AND MEANINGFUL AND
USEFUL TO THEM AND, OF COURSE, ALSO THE NEED
FOR A NEW FACILITY THAT VICTOR SEETO WAS
TALKING ABOUT.

WE HAVE BEEN TALKING ABOUT THIS FOR A LONG TIME. IT TOOK SEVERAL YEARS BEFORE THE COMMUNITY BOARD EVENTUALLY LANDED AT THE FILBERT SITE, AND, OF COURSE, IT'S ALREADY 20 YEARS SINCE THEN. NOW THERE IS REALLY A VERY

URGENT NEED FOR US TO CREATE A FACILITY THAT
THIS COMMUNITY HAS BEEN PROMISED FOR SO MANY
39 YEARS ALREADY, AND WE HAVE BEEN WAITING FOR SO
LONG.

I LOOKED AT THE ENVIRONMENTAL IMPACT
REPORT. I THOUGHT THERE WAS SOMETHING VERY
40 IMPORTANT THAT WAS MISSING IN THAT REPORT, AND
THAT IS THE EDUCATIONAL DIMENSION AND THE HUMAN
INTEREST AND NEEDS OF THAT CENTER FOR THE
COMMUNITY IN THIS CHINATOWN/NORTH BEACH AREA.

I TEACH AT UC BERKELEY, AND I'M VERY
INTERESTED, OF COURSE, IN EDUCATION. AND I
41 THINK THAT THAT CENTER WILL BE SUCH A
MEANINGFUL PLACE FOR THE STUDENTS WHO
DESPERATELY HAVE BEEN TRYING VERY HARD FOR ALL
OF THESE YEARS TO GET INTO BOTH OUR LANGUAGE
PROGRAMS AND OUR JOB-TRAINING PROGRAM.

YOU KNOW, LAST WEEK I WAS IN CONTACT
WITH THE SAN FRANCISCO CHAMBER OF COMMERCE
ABOUT SOLICITING THEIR SUPPORT FOR THIS, AND
42 THEY ARE EXCEEDINGLY VERY INTERESTED. I
BELIEVE THE PRESIDENT OF THE CHAMBER OF
COMMERCE HAS ALREADY SENT YOU A LETTER. AT
LEAST, THEY TOLD ME TODAY THEY HAD SENT THE
LETTER IN.

THEY THINK THAT THE NEW BUILDING WILL
ACTUALLY BE ABLE TO BRING EVEN CLOSER
RELATIONSHIP BETWEEN THE CHINESE COMMUNITY HERE
AND THE DOWNTOWN BUSINESS COMMUNITY.

I THINK, ALSO SPEAKING AS THE
CHAIRMAN OF THE BOARD OF CHINESE FOR
AFFIRMATIVE ACTION, I THINK WE ARE INTERESTED,
OF COURSE, IN KIND OF FISCAL FACILITIES AND 43
COMMUNITY RESOURCES THAT THAT BUILDING WILL
BRING TO THIS COMMUNITY, WHICH DESPERATELY
NEEDS THAT KIND OF FACILITY THAT HAS BEEN
DESCRIBED BY SEVERAL SPEAKERS BEFORE, WHETHER
IT BE THE AUDITORIUM, THE LIBRARY, THE MEETING
ROOM, CLASSROOM, CHILD CARE, WHAT HAVE YOU.

IT'S JUST SUCH A RARE OPPORTUNITY FOR
THE OPPORTUNITY COLLEGE TO DO WHAT IT HAS
ALWAYS PROMISED THIS COMMUNITY BUT HAS NOT BEEN
ABLE TO DO SO ALL THESE YEARS. I'M SO GLAD
THAT WE HAVE FOUND THIS OPPORTUNITY, AND I URGE
YOU TO PROCEED AS SOON AS POSSIBLE. THANK
YOU.

TRUSTEE RODIS: THANK YOU, PROFESSOR.

GEN FUJIOKA TO BE FOLLOWED BY BRENDAN
LEUNG.

MR. FUJIOKA: THANK YOU. MY NAME IS GEN 44

FUJIOKA. I'M AN ATTORNEY AT THE ASIAN LAW
CAUCUS, AND WE VERY MUCH SUPPORT THE CONCEPT OF
THIS COMMUNITY COLLEGE SITE, THE DEVELOPMENT OF
THE SITE.

MY COMMENTS, HOWEVER, ARE DIRECTED
TOWARD THE PLAN ITSELF, AND WE ARE CONCERNED
44 THAT THE PRESENT PLAN DOES NOT ADEQUATELY
PROTECT THE INTEREST OF THE PUBLIC IN HOUSING:
THERE WILL BE A LOSS OF 21 UNITS OF HOUSING.

AS FAR AS WE CAN TELL, BASED UPON OUR
INITIAL CONTACTS WITH THE RESIDENTS, THEY'RE
VERY LOW INCOME RESIDENT, AND THEY WILL NEED
MORE THAN MOVING EXPENSES AND ASSISTANCE
FINDING ANOTHER PLACE. THAT, IN FACT, WHAT IS
45 NEEDED IS REPLACEMENT HOUSING, AND THE CURRENT
PLAN DOES NOT ADDRESS THAT NEED. THE CURRENT
PLAN ONLY PROVIDES FOR REPLACEMENT HOUSING IN
THE FORM OF HOUSING FOR FACULTY AND STUDENTS ON
46 TREASURE ISLAND -- OR TO BE LOCATED ON TREASURE
ISLAND.

THAT, OBVIOUSLY, IS INADEQUATE, AND
WE CERTAINLY WANT THE PROJECT TO GO FORWARD.
47 AND, THEREFORE, WE URGE THAT THE FINAL VERSION
OF THE PLAN ADDRESS THIS ISSUE. I THINK IT'S
ONE THAT IS -- IT'S DEFINITELY SOMETHING THAT

CAN BE FIXED.

I GUESS WHAT WE'RE DIRECTING OUR
ATTENTION TO IS WE WANT TO MAKE SURE THAT THIS
PLAN IS ONE THAT ADDRESSES ALL THE NEEDS. SO 47
THAT WE DON'T HAVE TO CHOOSE THE INTEREST OF
THE STUDENTS OVER THE TENANTS, THE YOUNG OVER
THE OLD, THAT THIS IS A PLAN THAT IS A BENEFIT
FOR EVERYONE. THANK YOU.

TRUSTEE RODIS: THANK YOU.

BRENDAN LEUNG TO BE FOLLOWED BY BOB
SIEGEL.

MR. LEUNG: GOOD EVENING, CHANCELLOR
ANDERSON, AND BOARD OF TRUSTEES. MY NAME IS
BRENDAN LEUNG. I WOULD LIKE TO WELCOME ALL OF
YOU ON BEHALF OF THE CHINATOWN CAMPUS ADVISORY
COMMITTEE.

I WOULD LIKE TO THANK YOU FOR YOUR
MISSION AND YOUR LEADERSHIP THAT BRING 48
STATE-OF-THE-ART CAMPUS TO CHINATOWN AN ALMOST
REALITY THAT WE NEED TO PUSH ON.

EIGHT YEARS AGO, I BECAME A MEMBER OF
OUR ADVISORY BOARD. I REMEMBER THE DOMINANT
ISSUE WAS OUR LEASE IS GOING TO EXPIRE IN
2001. THAT WAS TEN YEARS AGO THEN. IT'S MUCH
CLOSER NOW. ANOTHER ISSUE THAT WAS CONCERNING

48 US IS THE CONTINUOUS INCREASING NEED OF OUR STUDENTS.

AT THAT POINT IN TIME, OUR APPROACH WAS LIKE A PATCHWORK TYPE OF APPROACH. WE ENDED UP HAVING 12 SATELLITE CAMPUSES. ONGOING, WE ARE STRUGGLING TO REPLACE SATELLITE SPACE THAT WE ARE LOSING, AND ONE THING THAT WAS CONSTANT THAT WE LEARNED IS THAT NEW SITES ARE HARDER TO COME BY, AND THEY'RE COSTING A LOT MORE.

A CASE IN POINT IS WE ARE IN DANGER NOW OF LOSING OUR ONE OF OUR MOST INNOVATIVE VOCATIONAL ESL PROGRAM; THAT IS THE CHINESE AMERICAN COOK SCHOOL. WE MAY BE LOSING THE TRAINING FACILITY BECAUSE OF THE DEMAND OF OTHER SOCIAL SERVICES PROGRAM NEEDS WITHIN THE COMMUNITY. WE CANNOT LET THAT HAPPEN TO OUR CAMPUS TOO.

I WOULD LIKE TO, AT THIS POINT IN TIME, ALSO THANK LAWRENCE WONG WHO'S SINCE HE'S BEEN ON THE BOARD HE'S BEEN REALLY ACTIVELY HELPING US, DIRECTING HOW TO APPROACH.

49 WHEN WE FIRST MET, 30 MILLION DOLLARS TO ACQUIRE THE NEW SITE IS SOMETHING WE REALLY DIDN'T KNOW HOW TO HANDLE, BUT THROUGH HIS

LEADERSHIP, WE ARE ABLE TO LOOK AT IT ONE STEP AT A TIME, AND NOW WE'VE REACHED A POINT THAT WE HAVE THE DOLLARS TO ACQUIRE A SITE. SO THAT WE ARE IN LINE TO GET STATE MONEY TO DO THE RENOVATION, BUT WE HAVE TO ACT NOW.

THE TIMING IS RIGHT, BECAUSE STATE HAS A BIG SURPLUS. IT HAS A BIG SURPLUS IN THE COMING FEW YEARS, AND THIS IS A TIME THAT THE GOVERNOR WILL GIVE DOLLARS FOR EDUCATION AND FOR INFRASTRUCTURE IMPROVEMENT. THIS IS THE RIGHT TIME.

50 WE, THE CAMPUS ADVISORY COMMITTEE, ALSO APPRECIATES THE COMPLEXITY OF LAND USE WITHIN THE COMMUNITY, AND WE KNOW THAT WE ARE PART OF THE COMMUNITY. IT'S A BALANCING ACT. WE PLEDGE TO WORK VERY CLOSELY WITH YOU TO HELP THE ˆ FONG BUILDING TENANTS THAT MAY LOSE THE HOUSING, BUT WE HAVE TIME.

IT WILL TAKE US TWO OR THREE YEARS TO GET THE STATE FUNDING IN ORDER TO BUILD OUR CAMPUS. WITHIN THIS TWO OR THREE YEARS, WITH THE HELP OF ALL OUR PARTNERS WITHIN THE COMMUNITY, WE CAN HELP OUR TENANTS TO FIND NEW HOMES.

51 BUT ON THE OTHER HAND, WITH THE

51

WELFARE OFF (INAUDIBLE), IT'S MANDATORY THAT WE HAVE A STATE-OF-THE-ART CAMPUS. WE HAVE WELFARE REFORM THAT IS BEING BUILT ON AT THE EXPENSES OF THE NEW IMMIGRANTS. 70 PERCENT OF OUR COMMUNITY RESIDENTS ARE IMMIGRANTS AND NEW IMMIGRANTS. THEY NEED TO IMPROVE THE SKILLS. THEY NEED TO GO TO ESL CLASSES. THEY NEED TO GO TO CITIZEN CLASSES. WE NEED TO EXPAND THOSE CAPACITIES.

WE ALSO HAVE THE BUSINESS WORLD EXPANDING, BLOOMING. THEY ARE TELLING US THAT IF WE HAVE WORKERS THAT CAN SPEAK ENGLISH AND HAVE GOOD WORK HABITS, THEY WILL HIRE THEM. THEY WILL TRAIN THEM. WE NEED TO HAVE THE ESL CLASSES TO MAKE OUR RESIDENTS COMPETITIVE SO THAT THEY CAN GET THOSE JOBS.

BUT ON THE OTHER HAND, BUSINESSES ARE TELLING US THAT BECAUSE OF TECHNOLOGICAL CHANGE, THEY NEED PEOPLE TO CONTINUE ON UPGRADING THEIR SKILLS, AND THIS IS WHAT OUR CAMPUS CAN PROVIDE IF WE HAVE OUR NEW CAMPUS, A NEW FACILITY.

I URGE YOU TO ACT NOW AND HELP US TO GET OUR NEW CAMPUS. THANK YOU.

PRESIDENT RODIS: THANK YOU.

BOB SIEGEL.

52

MR. SIEGEL: AS YOU KNOW, I'M CHAIR OF THE BUILDING COMMITTEE OF THE CHINATOWN/NORTH BEACH CAMPUS, AND IT'S BEEN -- THERE HAVE BEEN MANY TIMES I'VE BEEN HERE GIVING YOU SLIDES SHOWS AND TALKS AND PEP TALKS AND LOBBYING, ET CETERA, BECAUSE WE REALLY DO NEED A NEW CAMPUS AND I KNOW THAT YOU UNDERSTAND THAT.

I DID WANT TO WAIT UNTIL THE END AND JUST MAKE ONE FINAL NOTE: IT'S VERY CLEAR WE'RE DEALING WITH SOME VERY IMPORTANT ISSUES INVOLVING THE FUTURE LIVES OF MANY PEOPLE.

SOME BUILDINGS IN THE UNITED STATES HAVE VERY SYMBOLIC MEANING OF FREEDOM AND LIBERTY. PLACES LIKE ELLIS ISLAND AND THE STATUE OF LIBERTY ARE FIRMLY EMBEDDED IN THE PSYCHE OF IMMIGRANTS TO THE EAST COAST. FOR THE PEOPLE WHO HAVE IMMIGRATED TO SAN FRANCISCO SINCE 1977, THE CHINATOWN/NORTH BEACH CAMPUS HAS ALWAYS BEEN THERE, WARMLY WELCOMING THE IMMIGRANT AND PROVIDING EDUCATIONAL OPPORTUNITIES SEVEN, NOT FIVE DAYS A WAY WEEK, BUT SEVEN DAYS A WEEK, TO BECOME FLUENT IN ENGLISH, TO BECOME CITIZENS, TO ACQUIRE IMPORTANT JOBS SKILLS, AND TO OPEN THE DOOR TO

TWO- AND FOUR-YEAR DEGREES.

THERE IS NO DOUBT IN MY MIND THAT THE CHINATOWN/NORTH BEACH CAMPUS, BECAUSE OF THE IMPORTANT FUNCTIONS THAT IT SERVES, HAS TAKEN ON A VERY LOFTY SYMBOLIC MEANING.

52 WE ARE NOW AT VERY CRUCIAL JUNCTION BROUGHT ABOUT BY THE EXPIRATION IN 2001 OF OUR 20-YEAR-OLD LEASE ON A BUILDING THAT HAS BEEN INADEQUATE ALMOST FROM THE START. IT IS IMPORTANT TO OUR CAMPUS TO BE THERE IN THE NEXT CENTURY, TO CONTINUE TO SERVE THE VITAL NEEDS OF ALL THE PEOPLE. THAT IS WHY WE HAD AN ACTIVE BUILDING COMMITTEE FORMED IN 1994 TO CONSIDER OPTIONS AND DEVELOP STRATEGIES TO ACQUIRING A SITE THAT WILL CONSOLIDATE OUR MANY LEASED SITES.

53 IT WAS A FORMIDABLE TASK TO LOCATE A SITE, SUCH A SITE, IN THE HIGHLY CONGESTED AREA OF CHINATOWN/NORTH BEACH. IT IS WELL DOCUMENTED IN THE EIR DRAFT REVIEW HOW MANY SITES WE MONITORED AND INQUIRED ABOUT BEFORE WE SETTLED UPON THE CORNER OF WASHINGTON AND COLUMBUS, AN IDEAL SITE BECAUSE OF ITS PROXIMITY TO BOTH CHINATOWN AND NORTH BEACH, AS WELL AS THE FINANCIAL DISTRICT.

AS YOU KNOW, TONIGHT WE HAVE HEARD THE MANY REASONS WHY THE CHINATOWN/NORTH BEACH CAMPUS IS A SYMBOL TO MANY PEOPLE, AND THESE PEOPLE HAVE VERY PLAINLY STATED THESE REMARKS. I WOULD JUST LIKE TO SAY WE NEED TO BE THERE ON THE NEXT CENTURY AND WASHINGTON AND COLUMBUS IS A VERY, VERY GREAT PLACE TO BE. THANK YOU. 54

TRUSTEE RODIS: THANK YOU VERY MUCH, BOB.

AT THIS TIME, I WOULD LIKE TO OFFICIALLY CLOSE THE PUBLIC PORTION OF THIS THE HEARING. YOU WILL HAVE UNTIL SATURDAY 5:00 P.M. TO SUBMIT ANY FURTHER WRITTEN COMMENTS. THEY CAN BE DROPPED OFF AT 33 GOUGH STREET, AND THEY WILL ALSO BE INCORPORATED.

AS I MENTIONED AT THE BEGINNING, ALL OF YOUR COMMENTS, AS WELL AS THE WRITTEN STATEMENTS THAT YOU MAY PROVIDE US, WILL BE PLACED IN AN ENVIRONMENTAL IMPACT REPORT THAT WILL BE SUBMITTED THEN TO THE BOARD FOR OUR CONSIDERATION AT A CERTAIN TIME. THEN WE WILL VOTE ON THE ENVIRONMENTAL IMPACT REPORT AT THAT TIME.

AS I MENTIONED ALSO AT THE BEGINNING, WE WILL TAKE INTO ACCOUNT THE NEEDS OF THE TENANTS IN THE HOUSING THAT WILL BE DISPLACED, THAT WE WILL COMMIT OURSELVES TO FINDING ADEQUATE REPLACEMENT HOUSING AND NOT JUST, AS WAS MENTIONED, TRANSPORTATION MOVING EXPENSES, BUT WE WILL COMMIT OURSELVES TO THAT.

AT THE SAME TIME, WE WILL TAKE EVERYBODY'S COMMENTS, THE COMMENTS REGARDING THE DISABLED ACCESS. WE WILL TAKE ALL THAT INTO ACCOUNT.

WE WOULD LIKE AGAIN TO THANK YOU ALL FOR TAKING THE TIME TO COME HERE AND EXPRESS YOUR THOUGHTS, YOUR COMMENTS, YOUR FEELINGS ABOUT THIS ISSUE. WE WILL TAKE THEM VERY STRONGLY INTO ACCOUNT.

THERE ARE STILL A FEW MORE COPIES OF THESE HERE. FOR THOSE OF YOU WHO HAVE NOT HAD A CHANCE TO READ THE EIR, PLEASE TAKE THE COPIES THAT ARE HERE.

AGAIN, THANK YOU.

COULD YOU PLEASE TRANSLATE THAT?

TRANSLATOR: (SPEAKING IN CHINESE.)

TRUSTEE RODIS: THANK YOU VERY MUCH.

MEETING IS ADJOURNED.

(MEETING ADJOURNED AT 8:03 P.M.)

Public Hearing Transcript

Numerous comments heard at the public hearing support the project and do not address the adequacy of the EIR. The following comments are referred to the Responses and Comments Appendix for a response:

PH-8
PH-10
PH-11
PH-13
PH-17
PH-18
PH-19
PH-20
PH-22
PH-24
PH-25
PH-28
PH-29
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PH-31
PH-32
PH-35
PH-36
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PH-38
PH-39
PH-41
PH-43
PH-48
PH-51
PH-52
PH-54

Response PH-1

The following sentence has been added to the end of the last paragraph on p. 23 in Chapter II, Project Description, of the DEIR:

> **The new building would contain provisions for access and use by individuals with disabilities in accordance with state and local requirements.**

On p. 17 in Chapter II, Project Description, of the DEIR, it is noted that the site, building program, services, and activities must be accessible to those with disabilities in conformance with the California Building Code and the Americans with Disabilities Act of 1990.

Response PH-2

Please see Response PH-1 regarding access and use by individuals with disabilities. Existing buildings on the project site would be demolished prior to construction of the proposed campus.

Preservation and reuse of the Colombo Building was studied as an alternative in Chapter V, Alternatives (pp. 119 and 120), of the DEIR. It was determined that this alternative would represent a loss of approximately 14 classrooms and 8 laboratories, and a significantly reduced library and child care development. There would also be 64 fewer parking spaces.

While this alternative would not fully meet the objectives of the proposed project, it would avoid demolition of the Colombo Building. The Fong Building with its 21 residential units, would still be demolished to allow for project construction and remain a significant, unavoidable adverse impact.

Response PH-3

Please see Response 13-3 regarding mitigation measures to reduce housing impacts associated with the project.

Response PH-4

Please see Response PH-1 regarding access and use by individuals with disabilities.

Response PH-5

The objectives of the project are listed on pp. 17 and 18 in Chapter II, Project Description, of the DEIR. See also the Responses to Comments Appendix regarding comments supporting the project.

Response PH-6

Please see Response PH-5 regarding project objectives. See also the Responses to Comments Appendix regarding comments supporting the project.

Response PH-7

Please see Response PH-1 regarding access and use by individuals with disabilities.

Response PH-9

Please see Response PH-1 regarding access and use by individuals with disabilities.

Response PH-12

Please see Response PH-1 regarding access and use by individuals with disabilities. See also Response PH-2 regarding reuse of the Colombo Building.

Response PH-14

Please see Response 13-1, 13-2, and 13-3 regarding the EIR's discussion of housing impacts and proposed mitigation measures to reduce the housing impacts associated with the project.

Response PH-15

Please see Response 13-3 regarding mitigation measures relating to the replacement of housing.

Response PH-16

Please see Response 13-3 regarding mitigation measures relating to relocation assistance for tenants of the Fong Building.

Response PH-21

The comment is correct. DEIR p. 66 states "in May 1984, the LPAB voted to recommend that the Colombo Building be designated a City Landmark, but no formal designation by the City has taken place."

Response PH-23

Please see Response 13-3 regarding mitigation measures relating to relocation assistance and replacement housing.

Response PH-26

On pp. 43-44 and 50, the DEIR discusses the project's inconsistency with the City's Planning Code and acknowledges that as a result, the loss of 21 units of housing would be a significant impact. On pp. 42-43 and 47-48, the DEIR discusses the project's inconsistency with policies in the City's General Plan related to housing.

Response PH-27

Please see Response 13-3 regarding mitigation measures relating to relocation assistance for tenants of the Fong Building.

Response PH-33

Page 126 in Section VI.A of the DEIR identifies two environmental effects which cannot be avoided if the proposed project is implemented. Other identified environmental impacts can be mitigated to levels of insignificance. The two unavoidable impacts include demolition of the Colombo Building, a structure determined to be eligible for listing in the National Register of Historic Places, and the loss of 21 residential units in the Fong Building.

Response PH-40

The need for expanded campus facilities is described in Chapter II, Project Description, pp. 16-21 of the DEIR. Coinciding with those needs, the overall objectives of the project as stated by the District, are set forth on pp. 17 and 18 of the DEIR.

Response PH-42

A letter was received from the Chamber of Commerce dated May 17, 1998, signed by Roberta Achtenberg. The letter supports the project and does not address the adequacy of the EIR. The letter may be found in the Responses to Comments Appendix.

Response PH-44

Please see Response 13-1 regarding the EIR's discussion of housing impacts.

Response PH-45

Please see Response 13-3 regarding replacement housing and relocation assistance for displaced tenants.

Response PH-46

Please see Response 13-3 regarding the Treasure Island mitigation measure.

Response PH-47

Please see Response 13-3 regarding proposed mitigation measures to reduce the housing impacts associated with the project.

Response PH-49

This comment notes that state funding will be used for construction of the building, and does not raise any environmental issues.

Response PH-50

The Chinatown Campus Advisory Committee's comments regarding working with Fong Building tenants to find future housing are noted and will be considered by the District Board of Trustees in their decisions made on the project.

Response PH-53

Alternative sites previously considered for the Chinatown/North Beach Campus, and the reasons why those sites were rejected from further consideration, are described in Chapter V, Alternatives pp. 120-123 of the DEIR.

IV. SUMMARY OF TEXT AND FIGURE CHANGES

The following is a summary of text and figure changes that correct errors and update information provided in the Draft EIR. New figures added to the EIR are also included.

The first sentence of the third paragraph, p. 3, has been revised:

> **The project would be inconsistent with ~~not respond to~~ Policy 4 of Objective 2 of the *Urban Design Element* because the Colombo Building, a structure that is eligible for the National Register of Historic Places, would be demolished as part of the project.**

The following sentence has been added to the end of the last paragraph on p. 23:

> **The new building would contain provisions for access and use by individuals with disabilities in accordance with state and local requirements.**

The following changes have been made to the second and third sentences of the first full paragraph on p. 40:

> **The oldest buildings are those on Montgomery and Jackson Streets, which date back to the early 1850s. The more well-known are on Jackson Street, dating from the 1850s and 1860s, and it is from the latter that the whole district takes its name.**

The following has been added to the end of the second full paragraph on p. 47:

> **For a discussion of pedestrian impacts, see p. 85, III.D, Transportation.**

The first sentence of the second full paragraph, p. 49, has been revised as follows:

> **The project would be inconsistent with ~~not respond to~~ Policy 4 of Objective 2 of the *Urban Design Element* because the Colombo Building, a structure that is eligible for the National Register of Historic Places, would be demolished as part of the project.**

Paragraph three, p. 49, has been revised to read as follows:

> **The construction of an educational facility would support Objective 8 of the *Community Facilities Element*, which encourages fulfillment of the District's needs. ~~The immediate vicinity of the project site is identified in the *San Francisco General Plan* as a site for a Community College District facility that would enhance both the efficiency and effectiveness of the District./6/~~ Policy 1 states "Provide public school facilities for education in accordance with the need for such facilities as defined by the Unified School District and Community College District. Locate such facilities according to the Public School Facilities Plan and, wherever possible, make available for community use." The Public School Facilities Plan, Map 6, does not specifically identify the project vicinity as a Community College location. However, the District has clearly defined a need for public educational facilities in Chinatown. Therefore, the project would be substantially consistent with this objective.**

The following has been added to the end of the second paragraph on p. 53:

> **Figure B.3 in Appendix B is a map of building heights in the vicinity, published in the 1987 FEIR. While some development has occurred since the map was prepared in 1987, the map provides accurate information on most existing building heights in the vicinity.**

The following has been added after the third paragraph on p. 55:

> **Figure 18-2A is a view from Montgomery Street and Washington Street, looking northwest up Columbus Avenue. Views include the two-story Colombo Building,**

the octagonal bay of the three-story Fong Building on the west side of Columbus Avenue, and the Old Transamerica Building on the east side of Columbus. The two-story Colombo Building and the octagonal bay of the Fong Building form part of the low-rise character of the west side of Columbus Avenue between Washington Street and Jackson Street. Other two- to eight-story buildings in the Columbus Avenue corridor are visible in the distance.

The following has been added as a new fifth paragraph on p. 56:

VIEWS FROM MONTGOMERY STREET

In views north on Columbus Avenue from Montgomery and Washington Streets, the proposed seven- and eight-story building would contrast with the three-story Old Transamerica Building on the east side of Columbus (see Figure 18-2B). The view of this entrance to North Beach is now marked by the two-story Colombo Building and the Old Transamerica Building. The project would alter this existing view of the two older buildings, and replace it with one where the new, taller project would be seen with the Old Transamerica Building. Views up Columbus Avenue would continue to include the existing range of buildings types and heights north of the project site.

The following has been added at the end of the first partial paragraph on p. 63:

Figure 18-3 includes photographs of the Colombo Building.

The following text is added to the end of the first full paragraph on p. 63:

Figures 18-4 and 18-5 include photographs of the Fong Building.

The third sentence of the second paragraph on DEIR p. 64 and has been corrected as follows:

> **(This project is the Site ~~B~~ A project described in the 1996 SEIR.)**

The following has been added at the end of the second paragraph on p. 64:

> **Page & Turnbull prepared supporting documentation for the Section 106 process. Excerpts discussing the Colombo Building can be found in Appendix B.**

The following change has been made to the first sentence of the third full paragraph on p. 65:

> **The Jackson Square Historic District is located east of the project block; it is bounded on the west by Columbus Avenue, on the east by Sansome Street, and on the south by Washington Street, and extends nearly as far as Broadway on the north (see Appendix B, Figure B.1). The project site is outside of the district boundaries.**

The following sentence has been added before the last sentence of the first partial paragraph on p. 66:

> **As part of Section 106 review, SHPO found that Chinatown Historic District, as defined by the LPAD case report, was, with minor differences, eligible as a National Register district. SHPO listed the Chinatown Historic District on the State Register of Historic Resources on January 1, 1998./6A/**

A new footnote 6A has been added on p. 70 after footnote 6:

> **6A. Marilyn Lortie, Staff, State Office of Historic Preservation, telephone conversation, March 20, 1998.**

The last paragraph on p. 66 has been revised as follows:

> **Based on a review of San Francisco Planning Department data, the Fong Building is not rated in the 1976 survey. ~~or in the Heritage Survey,~~ nor is it individually eligible for any list. According to Page & Turnbull, the Fong Building was rated "C**" by Heritage. This rating indicates that the building could be upgraded to "B" if alterations were reversed or more history were known. Buildings rated "B" could be eligible for the National Register. In the opinion of Page & Turnbull, the building appeared eligible as a contributor to either the Chinatown or Jackson Square historic districts, should the boundaries of these historic districts be redefined to include the Fong Building, as indicated by a "3D(o)" rating in the survey. The Fong Building, however, has been determined by SHPO to be ineligible for listing on the National Register of Historic Places and lies outside the boundaries of the Chinatown and Jackson Square Historic districts, the two recognized historic districts in the project vicinity. It is rated as "compatible" in the Chinatown Area Plan./7/ Buildings rated "compatible," while not architecturally significant, are considered contributory to the historic character of Chinatown.**

The following has been added to the end of the first paragraph on p. 67:

> **Figure B.2 in Appendix B contains information on the location of architecturally or historically significant buildings in the vicinity of the project based on the 1996 SEIR.**

The fourth sentence in the first full paragraph on p. 77 has been changed as follows:

> **Based on the transportation study, all ~~study~~ crosswalks at the intersections of Columbus Avenue/Montgomery/Washington Streets and Kearny/Washington Streets currently operate at LOS B or better conditions during the weekday PM peak hour, which indicates that pedestrians are generally crossing under free flow conditions, with little conflict with other pedestrians.**

The following changes have been made to the first sentence of the last paragraph on p. 84:

> **A total of ~~14,061~~ 14,269 Muni passengers leave the transportation study area ~~daily~~ during the peak hour.**

The last sentence at the bottom of p. 84 and the first partial paragraph at the top of p. 85 have been changed as follows:

> **Capacity utilization varies from about 50% for the northeast screenline to 73% for the northwest and southwest screenlines. Capacity utilization for all screenlines is 70%. Thus, the screenlines have capacity to accommodate additional passengers.**

The second to the last sentence in the first full paragraph on p. 85 has been changed as follows:

> **The proposed project would increase ridership by 218 transit riders on the outbound screenline with the greatest increase on the northwest screenline (the other screenline would receive a smaller contribution of riders).**

The top of p. 109 has been revised as follows:

> **These additional mitigation measures would be implemented by the District and ~~might~~ would likely include a program of on-site monitoring of all site excavation, during which the archaeologist would record observations in a permanent log.**

The following mitigation measures have been added to p. 111 after the first paragraph:

> **HG-2 Replacement Housing: The District would provide replacement housing in the Chinatown/North Beach area of San Francisco for the twenty-one (21) units of housing currently in the Fong Building that would be removed as a**

result of the project. Potential mechanisms by which the District could implement this mitigation include, but are not limited to, the following:

(a) **Payment of funds to an agency or organization experienced in the development of housing for the construction of 21 units of housing in Chinatown/North Beach;**

(b) **Inclusion of 21 units of housing in the building constructed for the Chinatown/North Beach Campus Project; or**

(c) **Construction by the District of 21 units of housing in Chinatown/North Beach.**

The District would be responsible for securing financing for implementation of this mitigation measure. Because the District does not now know which of the proposed options it would pursue, the future environmental consequences, if any, of this mitigation measure are not yet known. Once the District determines how it would implement the mitigation measure, it would conduct any environmental review required by CEQA.

HG-3 **Relocation Assistance: In order to mitigate impacts associated with the displacement of tenants, the District would provide relocation assistance to all individuals and businesses displaced as a result of the project, pursuant to the California Relocation Assistance Act, California Government Code section 7260 et seq. Such assistance would include, among other things, help in locating replacement housing for displaced tenants, and financial assistance for displaced persons and businesses. The District has retained a relocation assistance consultant to assist in providing relocation assistance. The project will not be constructed for two to five years; thus approval of the project will not result in the immediate displacement of any tenants.**

This measure has been added to p. 112:

AR-2 **Historic Documentation of the Fong Building: Prior to the demolition of the Fong Building, the District would prepare historic documentation which would include a written description of the Fong Building and photographic documentation of the exterior of the Fong Building. Photographic**

> **documentation would be prepared to HABS standards of detail and quality for photographic documentation in 4x5 or 5x7 photographs and negatives.**

The following change to the last sentence of the second paragraph on p. 122 has been made for clarification:

> **The site is expected to be designated for housing, and thus is not available for purchase by the District./3/**

The following changes have been made to the second paragraph on p. 123:

> **The Building Committee also considered 23 additional alternative sites. Many sites were found to be inadequate because basic space program needs, such as required number of classrooms, laboratories, and faculty offices, could not be accommodated at those sites. Table 6 lists properties considered for possible lease or purchase, and the general reasons the sites were not pursued further. After consideration of those sites, the District found no site available for lease or purchase that would meet project objectives.**

The following sentence has been added as a new third sentence to the first paragraph on p. A.30 in Appendix A:

> **An archaeological resources report prepared for the current proposed project makes similar findings with respect to Lots 4, 5, and 12.[5A]**

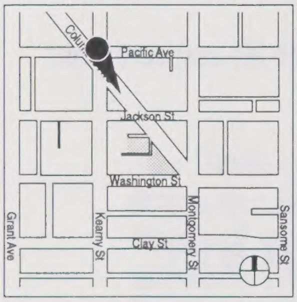
Footnote 5A for the new archaeological resources background report has been added to p. A.47 in Appendix A, as follows:

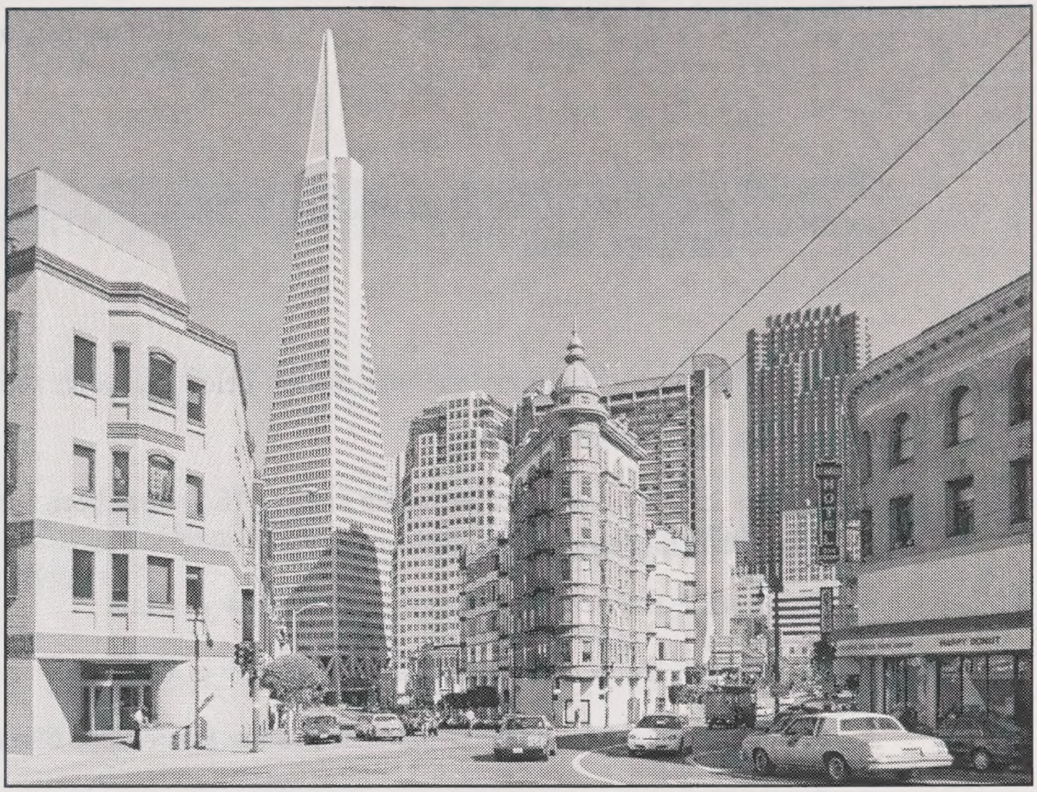
> 5A. **Archeo-Tec,** ***Archival Cultural Resources Evaluation of the Chinatown/North Beach Center EIR Project, Located Within a Portion of the Block Bounded by Jackson Street, Washington Street, Kearny Street and Columbus Avenue, City***

***and County of San Francisco, California*, prepared for EIP Associates, February 1998.**

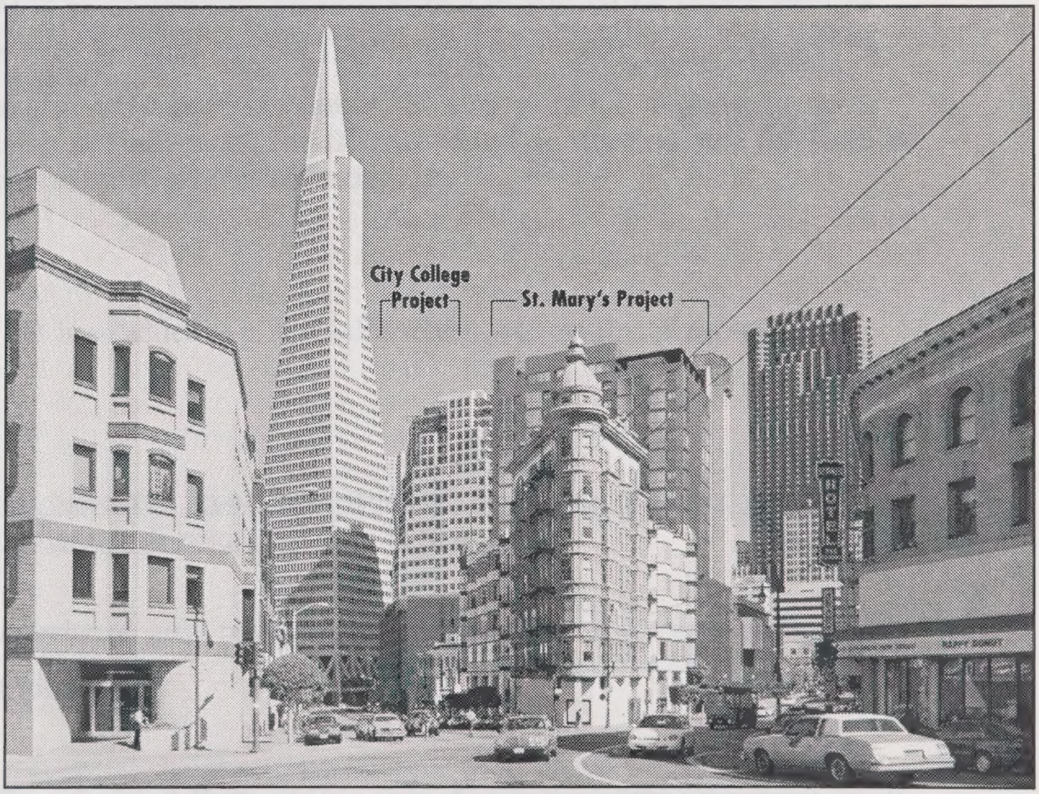
In addition to the above revisions, the information below has been added to the EIR as reproduced on the following pages:

- Figures 15 and 18 (revised to Figure number 18-1) have been corrected to show the correct labeling of Site A as the St. Mary's Project.
- Figure 18-2 has been added to the EIR as new p. 61a.
- Figure 18-3 has been added to the EIR as new p. 63a.
- Figures 18-4 and 18-5 have been added to the EIR on pp. 63b and 63c, respectively.
- Figure B.2 has been added to Appendix B.
- Figure B.3 has been added to Appendix B.
- The December 1996 discussion of the Colombo Building has been added to Appendix B.


Colu
Pacific Ave
Jackson St
Washington St
Clay St
Grant Ave
Kearny St
Montgomery St
Sansome St



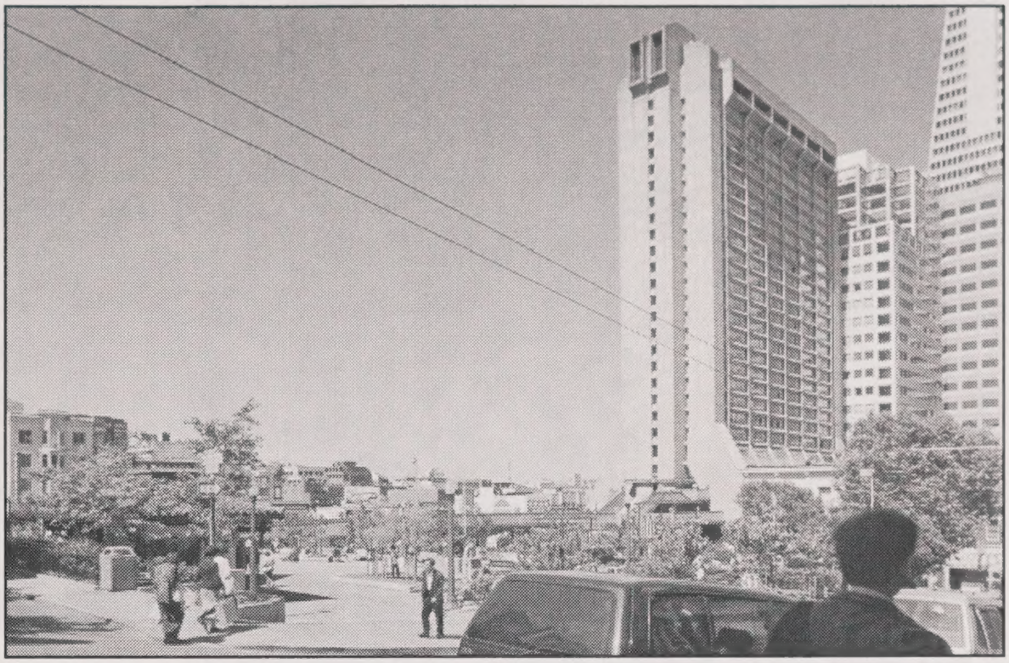
A — Project Site


City College Project
St. Mary's Project

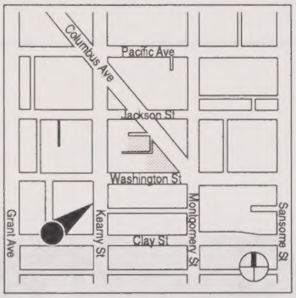
B — Proposed Project

Source: Square One Productions

Views from Columbus Avenue at Kearny Street Figure 15 (revised)



A — Project Site, near the southwest corner of Portsmouth Square


Columbus Ave
Pacific Ave
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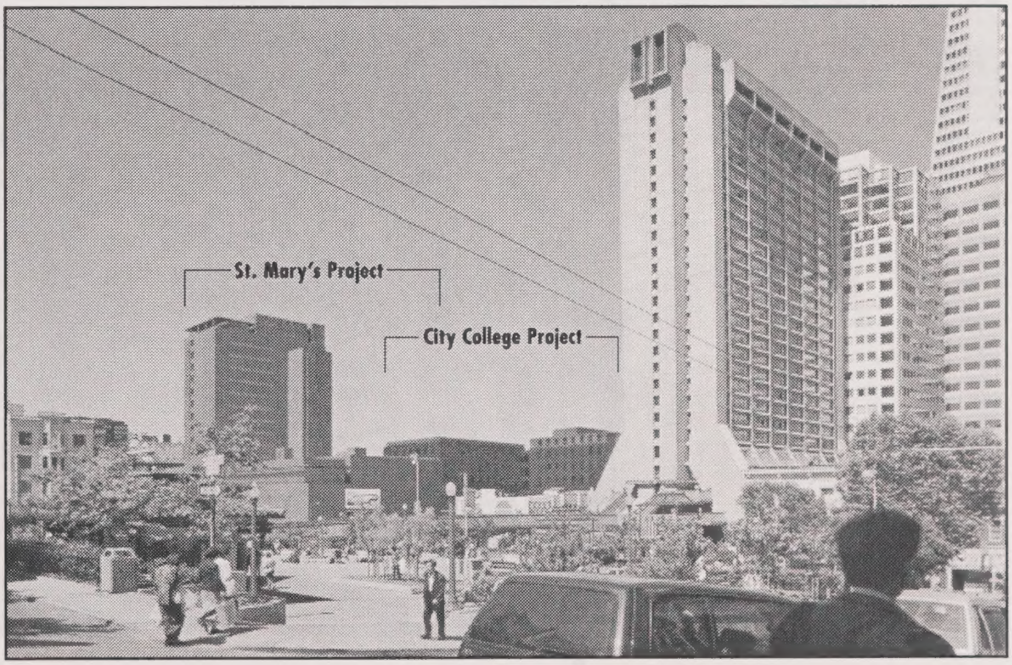
Washington St
Grant Ave
Kearny St
Clay St
Montgomery St
Sansome St

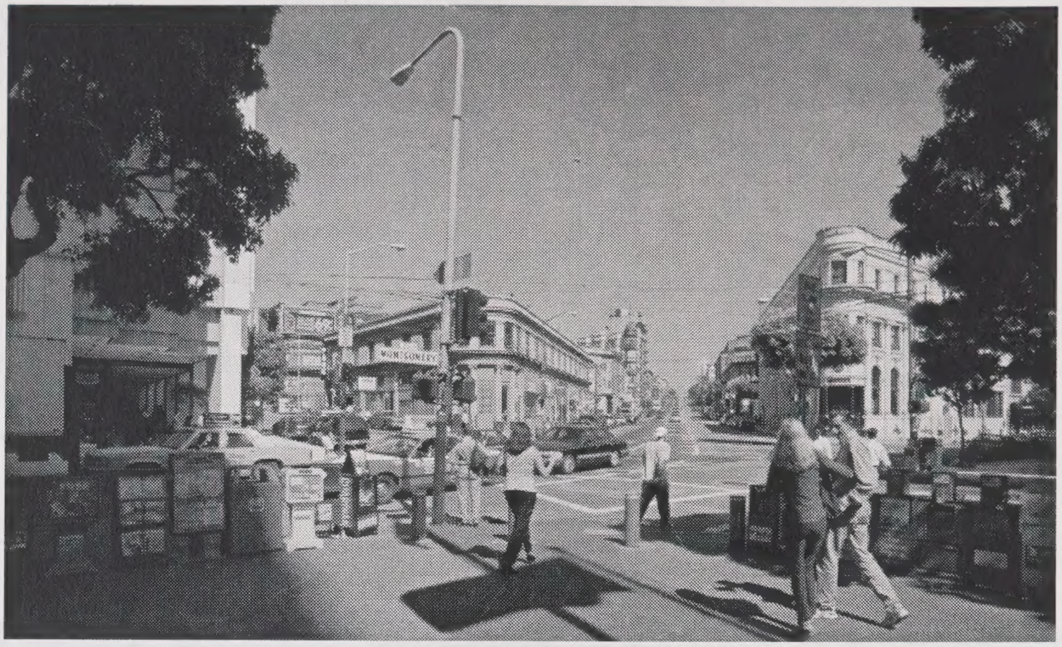

St. Mary's Project
City College Project

B — Proposed Project, near the southwest corner of Portsmouth Square

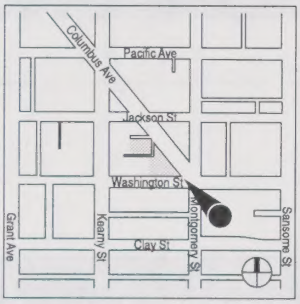
Source: Square One Productions

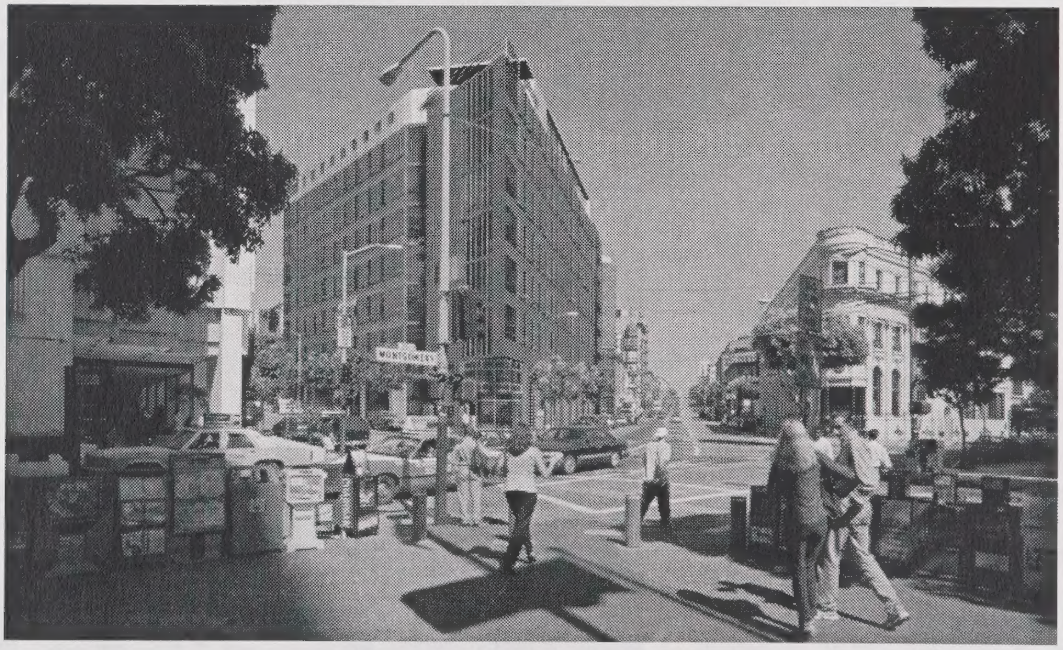
EIP ASSOCIATES

Views from Clay Street at Walter U. Lum Place Figure 18-1 (revised)



A — Project Site

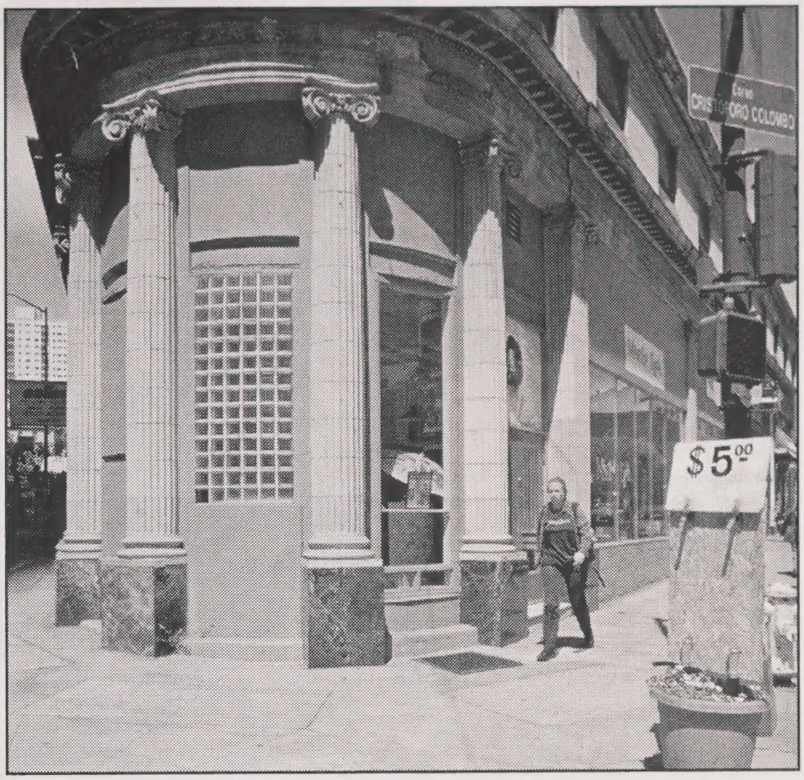

Columbus Ave
Pacific Ave
Jackson St
Washington St
Montgomery St
Sansome St
Grant Ave
Kearny St
Clay St



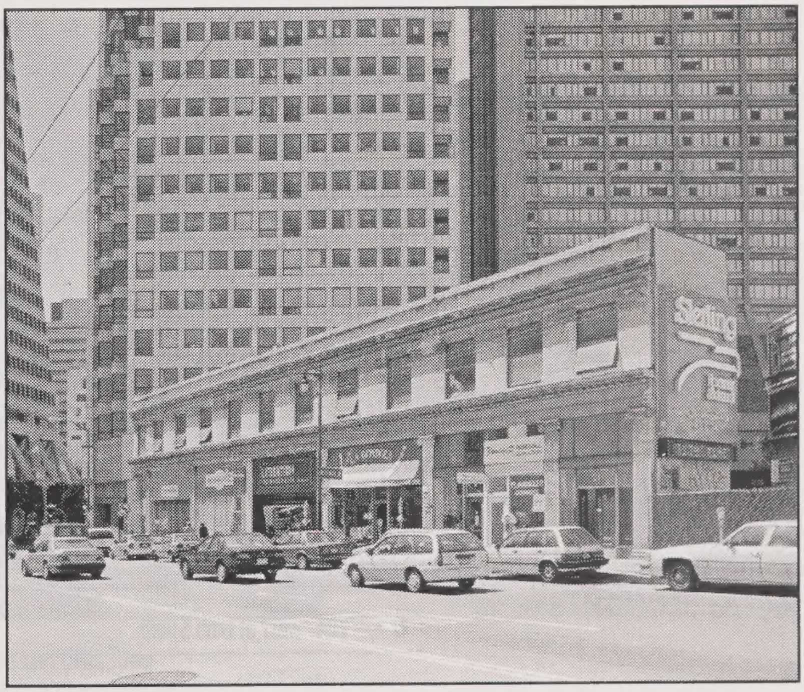
B — Proposed Project

Source: Square One Productions

Views from Transamerica Pyramid **Figure 18-2**


Corso CRISTOFORO COLOMBO
$5.00

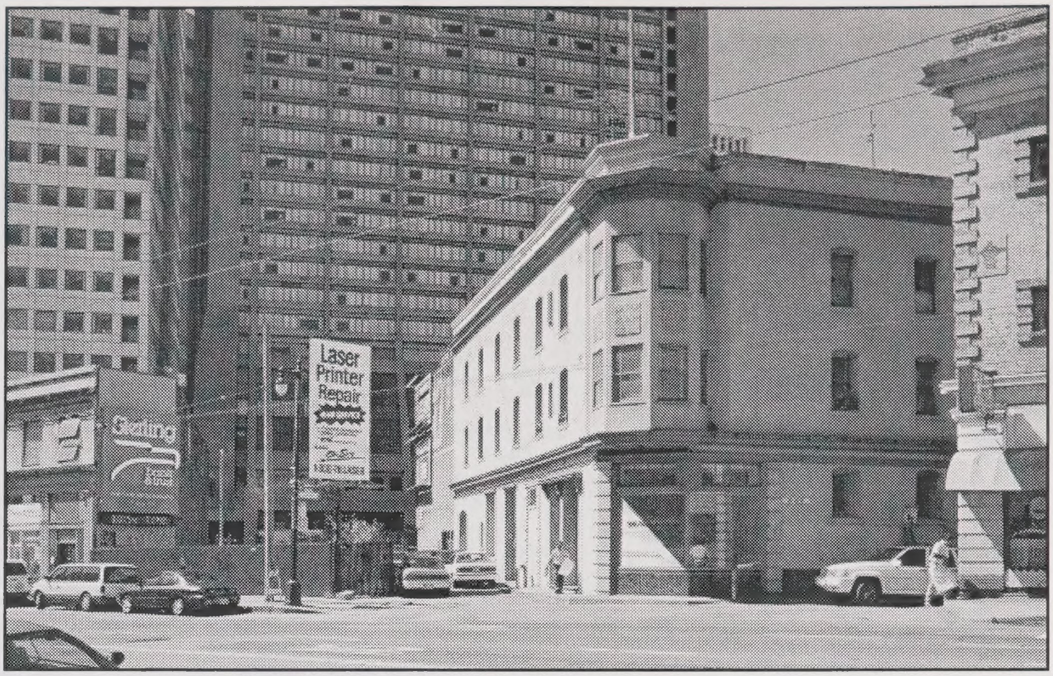
A — Corner of Washington Street and Columbus Avenue



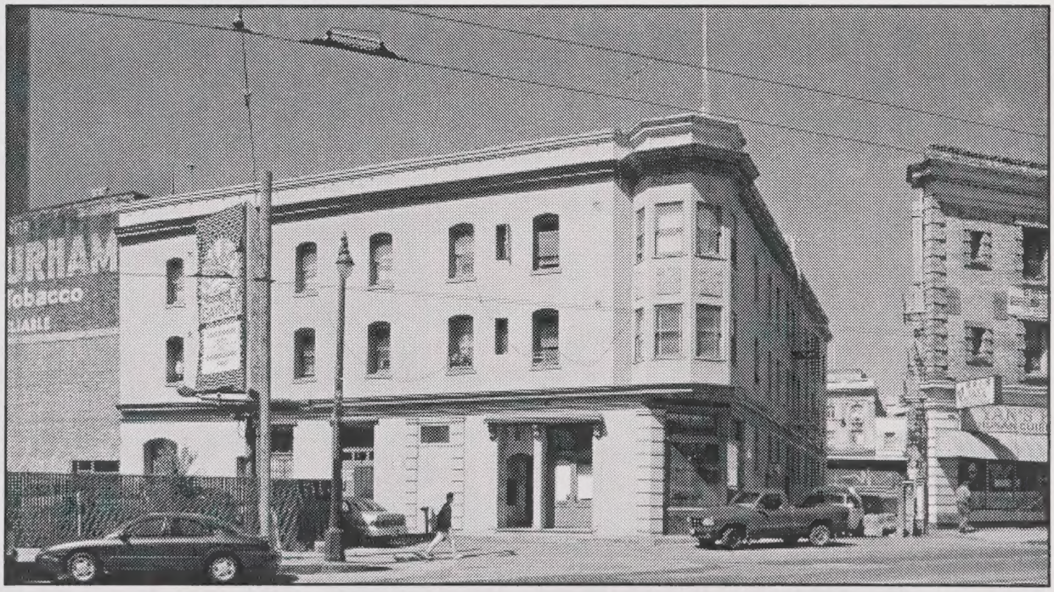
B — Columbus Avenue frontage

Source: Square One Productions

Views of the Colombo Building Figure 18-3


Laser
Printer
Repair

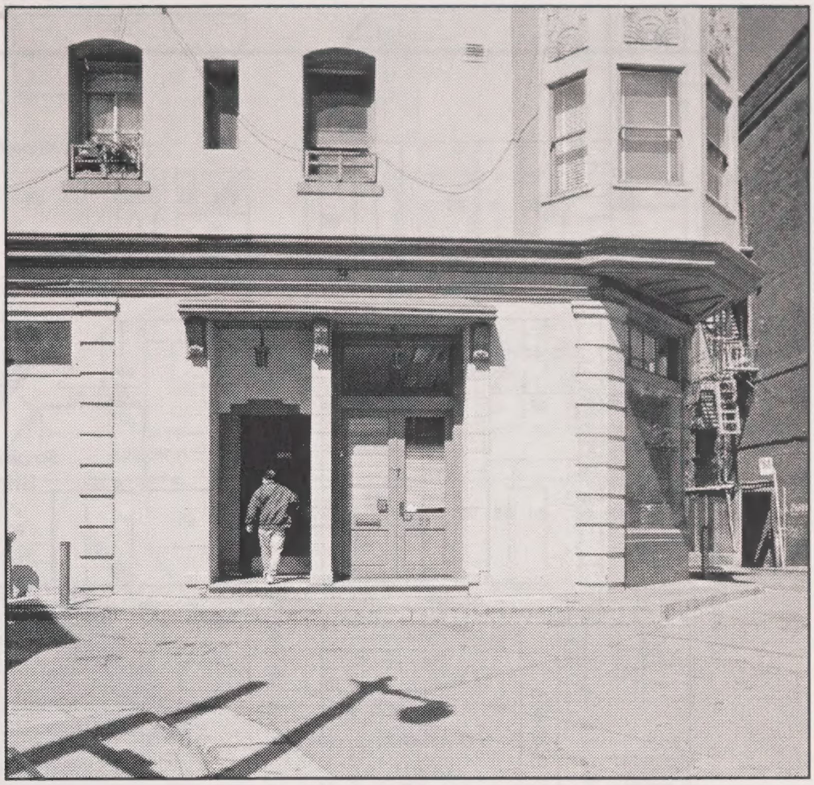
A — View south from Columbus Avenue


URHAM
Tobacco

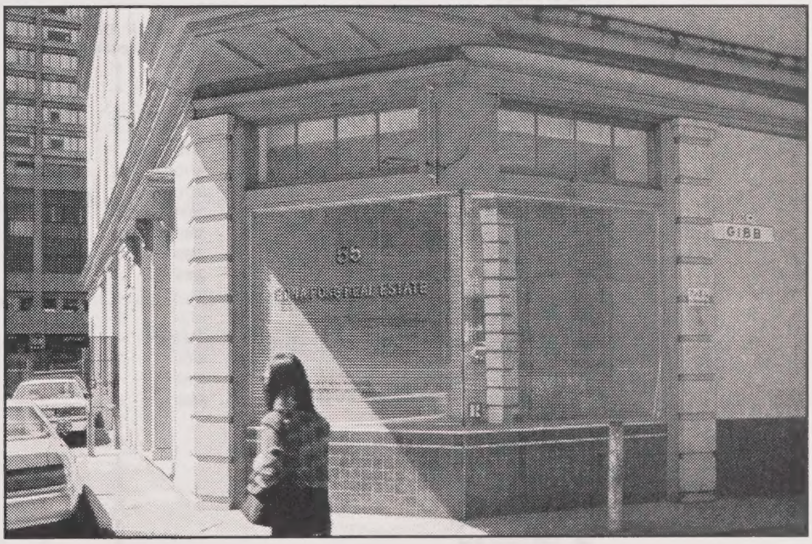
B — View west at Gibb Street

Source: Square One Productions

Views of the Fong Building Figure 18-4



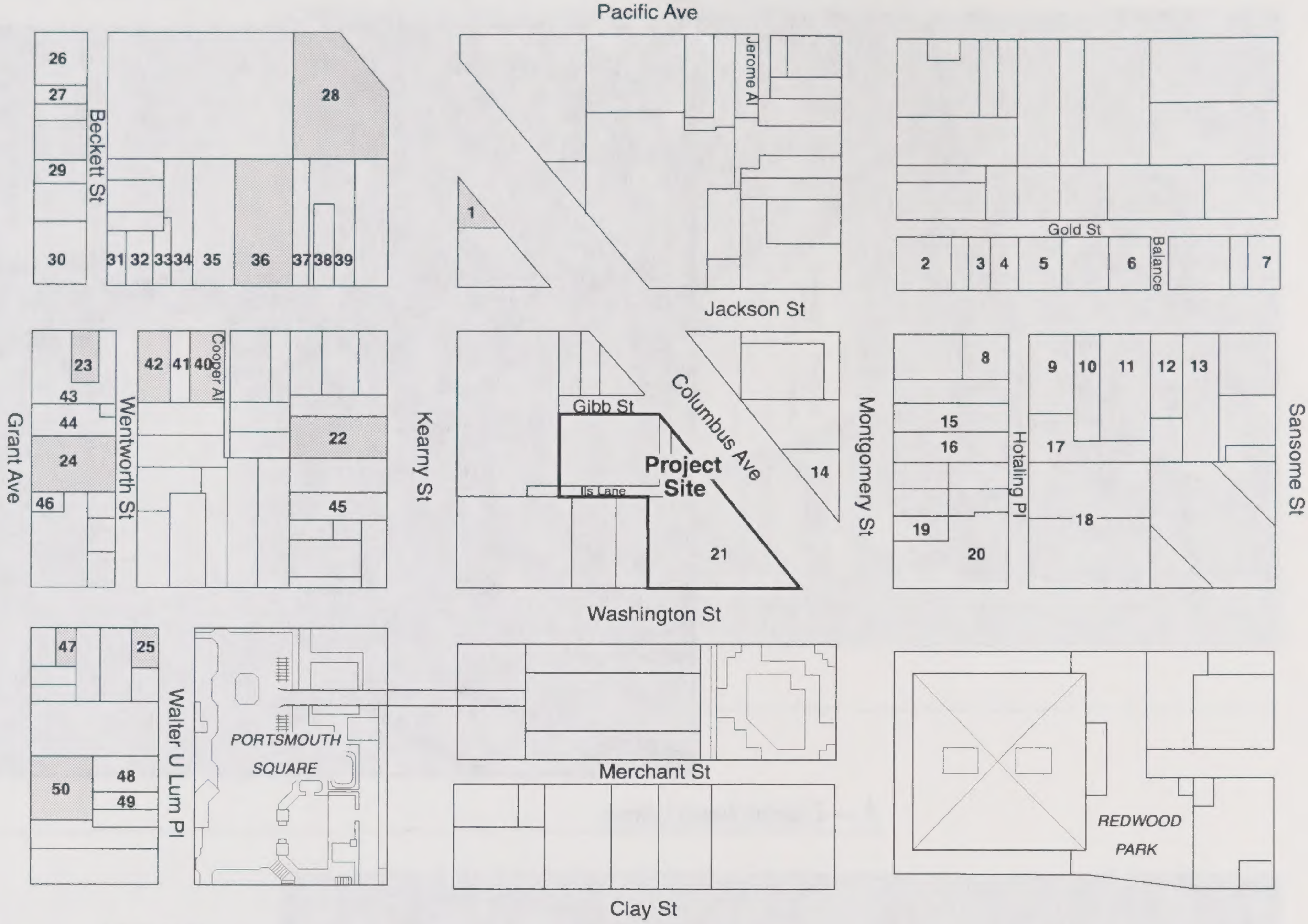
A — Columbus Avenue Entrance



B — Corner of Ils Lane and Gibb Street

Source: Square One Productions

Views of Fong Building Details Figure 18-5


Pacific Ave
Jackson St
Washington St
Merchant St
Clay St
Beckett St
Jerome Al
Gold St
Balance
Grant Ave
Wentworth St
Cooper Al
Kearny St
Gibb St
Ils Lane
Columbus Ave
Project Site
Montgomery St
Hotaling Pl
Sansome St
Walter U Lum Pl
PORTSMOUTH SQUARE
REDWOOD PARK
1
2
3
4
5
6
7
8
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LEGEND

		Landmark No & Effective Date		S.F. DCP Inventory	Heritage
1	Columbus Tower (Sentinel Building)	33	6/70	5	A
2	800-804 Montogmery St.	26	3/70	4	
3	470 Jackson St.	22	3/70		
4	472 Jackson St.	23	3/70	4	
5	458-60 Jackson St.	25	3/70		
6	432 Jackson St.	24	3/70	3	
7	400 Jackson St.	27	3/70	2	
8	473 Jackson St.	20	3/69	5	
9	451 Jackson St.	12	2/69	5	
10	445 Jackson St.	13	2/69	5	
11	441 Jackson St.	14	2/69	4	
12	415-31 Jackson St.	15	2/69	4	
13	407 Jackson St.	16	2/69	1	
14	Old Transamerica Bldg (4 Columbus Ave.)	52	3/73	4	
15	728-30 Montgomery St.	10	2/69	3	
16	Belli Bldg (722 Montgomery St.)	9	2/69	4	
17	32-42 Hotaling Pl.	11	2/69	5	
18	580 Washington St.			3	
19	710 Montgomery St.			3	
20	700 Montogmery St.			3	
21	Colombo Bldg (1 Columbus Ave.)			3	B
22	833 Kearny St.			3	B
23	675 Jackson St.			3	
24	930 Grant Ave.			3	B
25	743 Washington St.			3	C

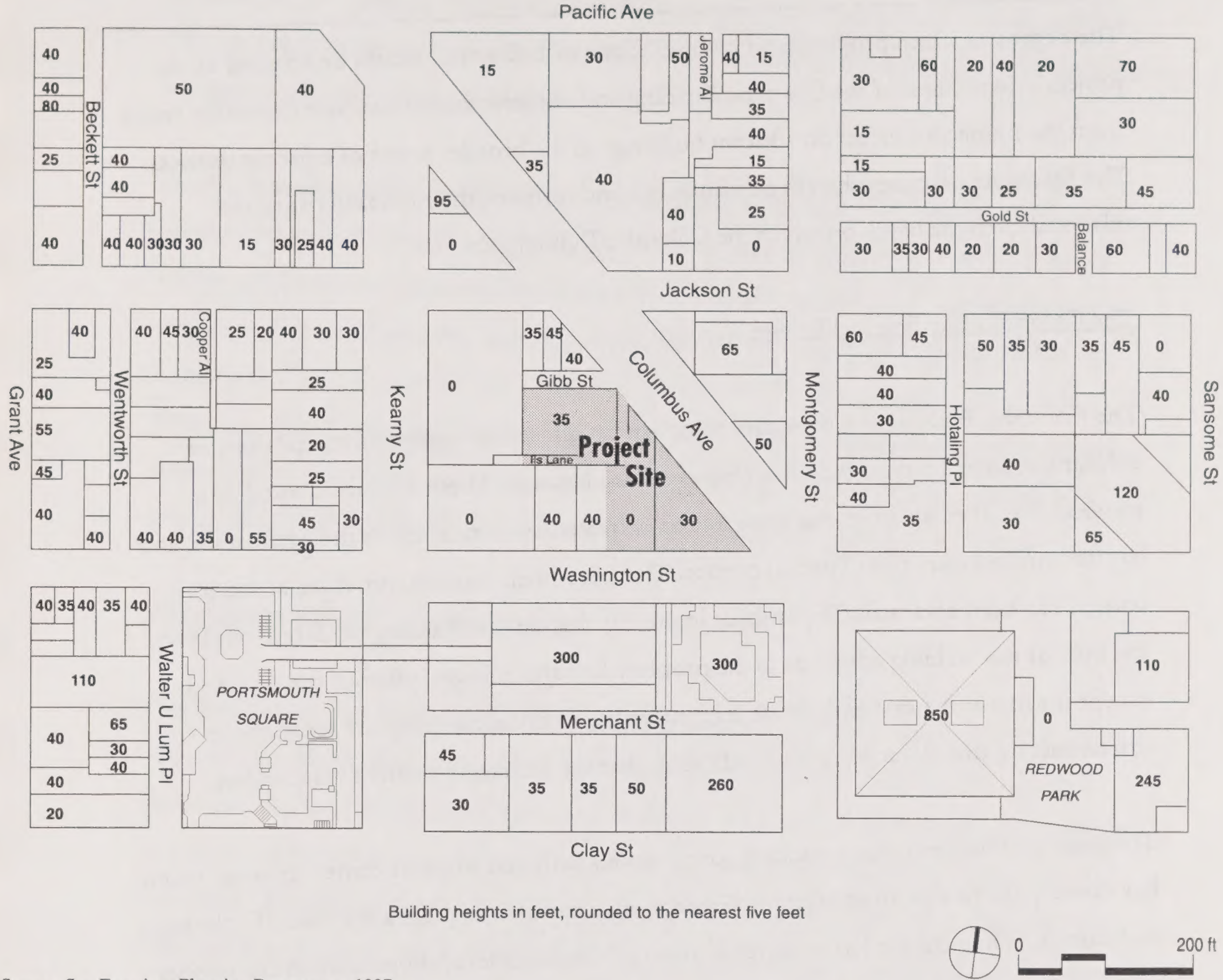
		Heritage
26	1056-66 Grant Ave.	C
27	1050 Grant Ave.	C
28	935-51 Kearny St.	C
29	1024-26 Grant Ave.	C
30	1000-22 Grant Ave.	C
31	670 Jackson St.	C
32	662 Jackson St.	C
33	656 Jackson St.	C
34	650 Jackson St.	C
35	640 Jackson St.	C
36	626-36 Jackson St.	B
37	622 Jackson St.	C
38	614 Jackson St.	C
39	608 Jackson St.	C
40	645-49 Jackson St.	B
41	655-57 Jackson St.	C
42	661-65 Jackson St.	B
43	952-66 Grant Ave.	C
44	940-50 Grant Ave.	C
45	825 Kearny St.	A/B
46	918-20 Grant Ave.	B
47	743 Washington St.	A
48	21 Walter Lum (Brenham) Pl.	B
49	17-19 Walter Lum (Brenham) Pl.	B
50	824-32 Grant Ave.	A

▨ Structures on the list of significant buildings in Chinatown (1985 Chinatown Survey)

Source: San Francisco Planning Department

EIP

Architecturally Significant Buildings in the Project Vicinity Figure B.2


Pacific Ave
Jackson St
Washington St
Merchant St
Clay St
Grant Ave
Beckett St
Wentworth St
Cooper Al
Kearny St
Jerome Al
Gibb St
Columbus Ave
Project Site
Montgomery St
Hotaling Pl
Sansome St
Gold St
Balance
Walter U Lum Pl
PORTSMOUTH SQUARE
REDWOOD PARK
0
200 ft

Building heights in feet, rounded to the nearest five feet

Source: San Francisco Planning Department, 1987.

Building Heights in the Project Vicinity Figure B.3

III. Description of Affected Historic Properties

The degree to which properties within the "Zone of Influence" would be affected by the project's demolition of the Colombo Building and construction of new use structures varied from the immediate effect on adjacent buildings to the broader scope of adjacent districts. The following describes the affected buildings and districts, their characteristics and relationship to the block on which the Colombo Building sits.

The Colombo Building and Its Site

The Colombo Building is a two-story composition displaying engaged Ionic pilasters or columns at street level on the Columbus Avenue elevation. These are surmounted by a classical (Ionic) entablature; the second story is treated as an attic above the entablature, and has its own less elaborate (Tuscan) cornice. The once-open rotunda, provided at the gore corner, has been enclosed. Of particular interest is that on the Washington Street elevation, the bulk of the building advances to the property line and engaged pilasters are not used except for one at the east end, which terminates the rotunda. Simple piers separate the storefronts on this elevation: a clear indication that the architects thought it secondary.

The basic building material is concrete, ornamented with cast stone or cement plaster, which have been painted a number of times. Green marble appears on piers a the base of columns or pilasters. While change has occurred in most of the lower level shops, certain storefronts appear to be original, and certain interior fittings may date from the date of construction or the decade immediately following. Upper level windows are one-over-one wood sash, the lower half of which project as awning units; the curved windows above the rotunda also are one-over-one awning units which are quite unusual. Six of the upper level windows have been replaced with modern aluminum sash.

The critical relationship of the effected block and its surroundings is apparent in the relationship between the Colombo Building and the Fugazi Bank/Old Transamerica Building on the opposing corner. The matching pair introduce the beginning of Columbus Avenue from the downtown area by demonstrating the unusual axis of the avenue in the design of each gore corner. The rounded corner signals transition and a change in axis while the scale of the buildings represents that of the area and the cohesion of historic districts. The cohesion of the Colombo building to the Old Transamerica Building seems to bind it to the Jackson Square Historic District.

A sufficient amount of the fabric of the building still remains so that the Colombo Building retains architectural integrity. On the basis of the prominence of its architects; its urban design significance at the inception of Columbus Avenue; its noteworthy and prominent owner; and its condition, the Colombo Building has been proposed, in June of 1984, by the Landmarks Preservation Advisory Board (LPAB) to be a Landmark of the City of San Francisco. The nomination was never acted upon by the City Planning Commission or the Board of Supervisors. Another case report, completed in 1996, was heard and adopted by the LPAB in November of 1996. These case reports are included in this section.

The Former International Hotel Site

The former site of the International Hotel (Site A of the proposed project) has been the location of political controversy since 1979, when the Hotel, a single-room occupancy facility serving low-income tenants, was demolished, initially to provide a site for continued downtown office development. In addition, the site stands physically at the crossing of a number of patterns of development: the Jackson Square Historic District to the east; Chinatown to the west; North Beach to the north; and downtown development to the south.

Site A extends on Kearny Street between the intersection of Kearny and Jackson and a point approximately 180 feet to the south; the Jackson Street frontage is about 110 feet, and takes up most of the block front between Kearny-Jackson and Lot 14. Of the two frontages, that on Kearny Street is the more important, because the block is trapezoidal in plan, and a triangular portion of Block 176 stands immediately to the north, upon which have been built 900 and 916 Kearny Street (Columbus Tower) which dominate views of the Jackson Street frontage from northerly angles of view. {Section II, Figure 5; Section III, Photograph 17}

The proper role of any development on such a site should be to reflect the scale, character, and quality of surrounding zones. In this case, to reflect such differing zones and scales is a difficult task for the designer. Effect of the introduction of the subject project into this site is discussed in Section IV.

Properties Adjacent to Projects Sites A & B

The structures other than those properties which the project directly effects are the six buildings on the trapezoidal block that date from the same post-1906 earthquake development of the Colombo Building. These buildings are somewhat less significant than the Colombo Building but their frontage on Columbus Avenue, Washington Street, and Jackson Street give them prominence at the entrance of such an integral passage from downtown and toward the North Beach area. Architecturally, most of these buildings are variations of the Classical Revival style but the scale is consistently maintained at two- to three- stories with a division of the first story and the upper levels by a distinct cornice or entablature line. Historic Resources Inventory forms have been included, in this section, with descriptive text and more detailed information on each of the five buildings, of which only one had previously been completed, 57-67 Columbus Avenue.

Jackson Square Historic District

Jackson Square is a designated landmark and National Register of Historic Places district, in which the oldest commercial buildings exist from the 1850's and 1860's. Although these buildings have been adapted for new use, it is apparent that their existence has regulated the type of development in the area and the scale to which it is built. The District stands as an example of pre-1906 earthquake architecture dating from the days of the Gold Rush. The buildings maintain a modest scale, mostly under forty feet and their detailing, fenestration, and materials have a continuity that unifies the district. The Classical detailing of the buildings is characteristic of mid-nineteenth century commercial storefronts. The relationship of Jackson Square to the Colombo Building block is bound by the spine of Columbus Avenue, on which both face and contribute to. It is obvious that the buildings in the area have taken their lead from Jackson Square just as the Colombo Building took its direction in design from the Old Transamerica Building.

Proposed Chinatown Historic District

West of the Colombo Building block, is the proposed Chinatown Historic District. Chinatown is a less unified zone than the Jackson Square District, and it is characterized by buildings built within the first two decades after the 1906 earthquake-fire with a several modern interventions and structures that have occurred since 1906. Identified by Chinese or Chinese-American ownership and use, Chinatown displays intense and small-scale mercantile, industrial and residential activity. Many buildings in this district were built in the Classical Revival style and reflect, in their detailing, the Asian origins of the majority of its inhabitants and its commercial atmosphere. A Chinatown Historic District has been considered by the Landmarks Preservation Advisory Board, based on a proposal by Patrick McGrew, President of the Board, and sent to the City Planning Commission in September, 1985, the proposed boundaries of which are indicated on Figure 5 (Section II). Research supporting Mr. McGrew's proposal is contained in *North Beach San Francisco: An Architectural, Historical and Cultural Survey*, by Anne Bloomfield, Daniel Warner and Nancy Olmsted, 1982. The proposed district has not been adopted.

Since the buildings on the project site facing the Chinatown area have since been demolished, there currently does not seem to be a direct relationship between the two. Unlike those on the project block and in Jackson Square, many buildings in Chinatown rise above the three-story level and are not confined to a common scale. Thus, the link between the districts and the project site are the Classical style and detailing.

Portsmouth Square

Portsmouth Square represents the earliest beginnings of the City, though its present character dates mainly from the late 1960s, when a parking garage was placed beneath the Square and a bridge connecting it to the Chinese Cultural Center in the Holiday Inn was built, located on Block 208.

Downtown San Francisco

Finally, the northernmost edge of downtown development is indicated on blocks 208 and 207, across Washington Street from the project site, with Holiday Inn; Montgomery-Washington office-residential tower; and the Transamerica Pyramid marking the present boundary of large-scale development.

State of California — The Resources Agency
DEPARTMENT OF PARKS AND RECREATION

PRIMARY RECORD

Primary #
HRI #
Trinomial
NRHP Status Code 3D
Other Listings
Review Code Reviewer Date

Page 1 of 2

*Resource Name or #: (Assigned by recorder) John G. Ils Hotel

P1. Other Identifier:

*P2. Location: ☐ Not for Publication ☒ Unrestricted *a. County City & County of San Francisco
and (P2b and P2c or P2d. Attach a Location Map as necessary.)
*b. USGS 7.5' Quad N3745-W12222.5/7.5 Date 1973 T 1S ; R 5W ; __ ¼ of __ ¼ of Sec __ ; ______ B.M.
c. Address 53-55 Columbus Avenue City San Francisco Zip 94111
d. UTM: (Give more than one for large and/or linear resources) Zone ____ ; ________ mE/ ________ mN
e. Other Locational Data: (e.g., parcel #, directions to resource, elevation, etc., as appropriate)
Assessor's Block 195/Lot No. 12

*P3a. Description: (Describe resource and its major elements. Include design, materials, condition, alterations, size, setting, and boundaries)

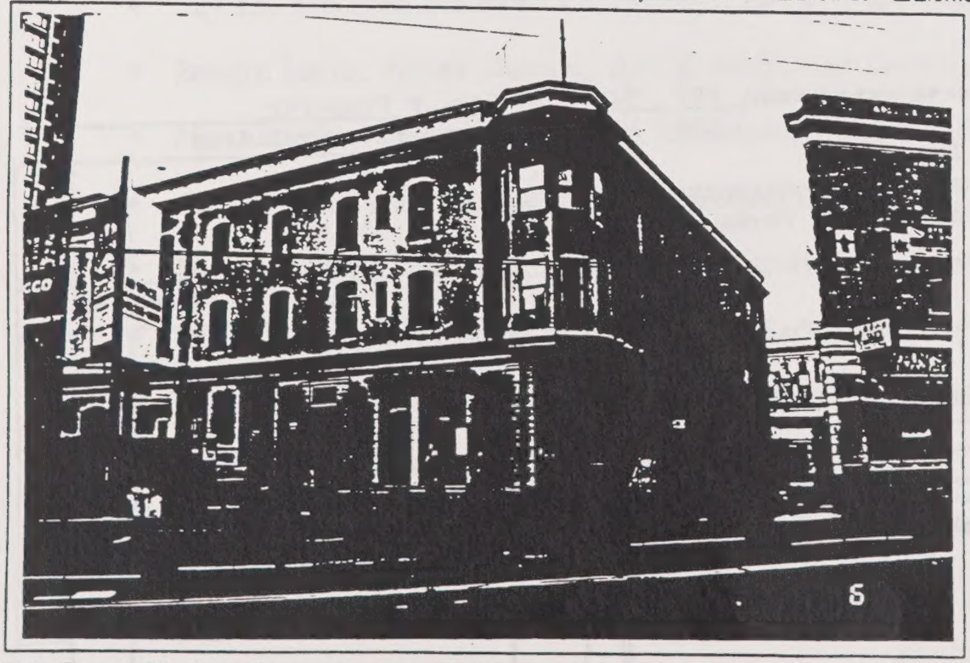
This 1910 building sits at the crossing of two minor streets and Columbus Avenue, expressing this meeting with an octagonal corner. The three-story building has a commercial function but is also a large residential complex. The corner piece projects beyond the first floor flattened corner and the second and third levels are separated by decorative panels. The building is divided horizontally by the first level entablature and the cornice that tops the third level, a typical characteristic of the buildings in the area. Above this cornice rises a parapet finished with a simple cornice treatment. The double-hung windows of the projecting octagonal corner, on the upper levels, are rectangular in contrast to the segmental arch openings of the inset double-hung windows on the rest of the building. The inset doors have wooden surrounds and some openings are surmounted by a galvanized iron lintel. The corner storefront has two transom windows that meet at the corner. On the first level, brick pilasters divide the building into irregular bays.

The building was constructed with brick and finished with stucco. The cornices are made of galvanized iron.

The corner of the building projects onto the street edge and the entire building covers an area of about 75' x 106'.

*P3b. Resource Attributes: (List attributes and codes) HP3. Multiple Family Property
HP6. 1-3 story commercial building

*P4. Resources Present: ☒Building ☐Structure ☐Object ☐Site ☐District ☐Element of District ☐Other (Isolates, etc.)



P5b. Description of Photo: (View, date, accession #) 11/02/96
Roll 1/Frame 7
NE corner from Columbus Av

*P6. Date Constructed/Age and Sources: ☒Historic ☐Prehistoric ☐Both
1910, factual
Water Dept.

*P7. Owner and Address:
Fong NY Enterprise of Cal,I
55 Columbus Ave
San Francisco, CA 94111

*P8. Recorded by: (Name, affiliation, and address)
J. Gordon Turnbull
Page & Turnbull, Inc.
San Francisco, CA 94108

*P9. Date Recorded: 11/96

*P10. Survey Type: (Describe)
Supplemental EIR (Draft)
Kearny St./Columbus Ave.
Project

*P11. Report Citation: (Cite survey report and other sources, or enter "none.") City & County of San Francisco, 12/12/96
Kearny St./Columbus Ave. Project: Supplemental EIR

*Attachments: NONE ☒Location Map ☐Sketch Map ☐Continuation Sheet ☒Building, Structure, and Object Record ☐Archaeological Record ☐District Record ☐Linear Feature Record ☐Milling Station Record ☐Rock Art Record ☐Artifact Record ☐Photograph Record ☐ Other (List)

*Required Information

State of California — The Resources Agency
DEPARTMENT OF PARKS AND RECREATION

Primary #
HRI#

BUILDING, STRUCTURE, AND OBJECT RECORD

Page 2 of 2

*NRHP Status Code 3D

*Resource Name or # (Assigned by recorder) John G. Ils Hotel

B1. Historic Name: John G. Ils Hotel

B2. Common Name: John G. Ils Apartments

B3. Original Use: Hotel   B4. Present Use: Apartments, Office space

*B5. Architectural Style: Classical Revival with unique octagonal corner piece

*B6. Construction History: (Construction date, alterations, and date of alterations)
Constructed: 1910
Remodeled: 1939, alterations unknown

*B7. Moved? ☒No ☐Yes ☐Unknown Date: Original Location:

*B8. Related Features:
NONE

B9a. Architect: Fabre and Mohr   b. Builder: Unknown

*B10. Significance: Theme Architecture   Area San Francisco

Period of Significance post-1906 earthquake   Property Type Residential/Commer.   Applicable Criteria C

(Discuss importance in terms of historical or architectural context as defined by theme, period, and geographic scope. Also address integrity.)

The building was constructed after the 1906 earthquake during a time of great urban renewal. The Classical Revival style of the building is not atypical for the area, but its unusual site allows the corner to face onto Columbus Avenue. Although the octagonal corner is matched by other corner buildings in the area, the building is unique in that most of the facade does not front on Columbus Avenue as other facades do. The pilasters on the first level are irregularly spaced and their brick banding gives the building texture. The banding of the cornice above the first level and another above the third is a common feature of the area.

Integrity-
A sufficient amount of the building's fabric still remains so that the building retains architectural integrity. Only minor damage is discernible at street level.

B11. Additional Resource Attributes: (List attributes and codes) HP3. Multiple Family Property
HP6. 1-3 story commercial building

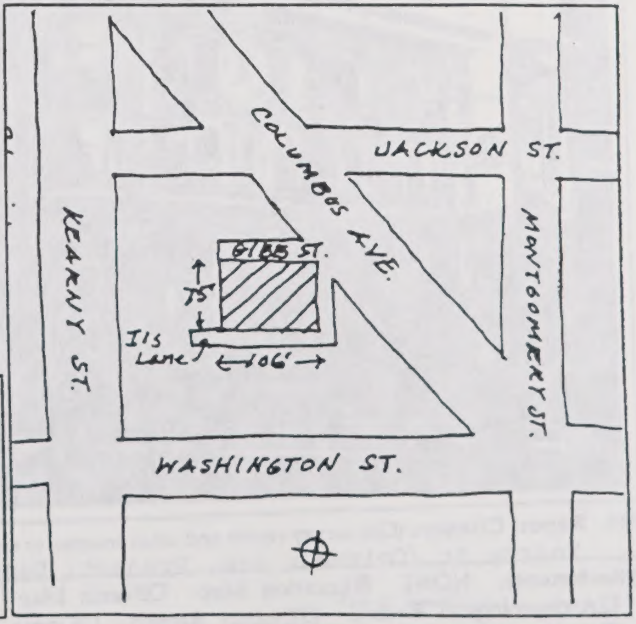
*B12. References:
San Francisco Downtown Inventory
Foundation for San Francisco's Architectural Heritage-Research & Field Survey Forms

B13. Remarks:
Zoning: CRNC
Threats: None known

*B14. Evaluator: J. Gordon Turnbull

*Date of Evaluation: 11/96

(This space reserved for official comments.)



DPR 523B (1/95)   *Required Information

V. ADDITIONAL LETTERS

A number of letters regarding the Chinatown/North Beach Campus project were received from various community organizations and individuals that did not address the content or adequacy of the DEIR. The letters of comment focused on support of the proposed campus and addressed various aspects of the proposed project itself including, as stated in the letters, enhanced opportunities for education, and the ability of the project to meet the growing needs of the community. The letters will be reviewed and considered by the San Francisco Community College District during its decision-making process. Thus, while the letters of comment do not specifically pertain to the DEIR, they are provided here for informational purposes in this portion of the Final EIR.

- Rev. Harry Chuck, Executive Director, Donaldina Cameron House
- Samuel Kwong, President, Asian American Architects and Engineers
- Gloria Tan, Executive Director, Asian Women's Resource Center
- Tom Hsieh
- Lily Lo, Manager, Northeast Community Federal Credit Union
- Emalyn Lapus, Project Director, AACE Educational Services Talent Search Program
- May Gutchinov, Executive Director, Chinatown Youth Center
- Alan T. Huie, Co-Chair, Asian Pacific Democratic Club
- Darin Ow-Wing, Executive Director, Community Educational Services
- Jennie Chin Hansen, Executive Director, On Lok Senior Health Services
- Mabel Teng, Member, Board of Supervisors, Chair, Finance Committee
- Leland Y. Yee, Ph.D., Member, Board of Supervisors
- Roberta Achtenberg, Senior Vice President for Public Policy, San Francisco Chamber of Commerce

- Clifford Waldeck, President, Waldeck's Office Supplies
- Po Yee Au, Director of Employment Training and Economic Development Program, Self-Help for the Elderly

DONALDINA
CAMERON
HOUSE

長老會金美倫堂

920 Sacramento
Street
San Francisco,
California 94108

Telephone
(415) 781-0401

Fax Number
(415) 781-0605

May 18, 1998

To: San Francisco Community College Board
From: The Rev. Harry Chuck
Re: Construction of a Community College Center in Chinatown

Dear Members of the Board:

Development and construction of a Community College Center in the Chinatown area makes a great deal of sense, both common sense and dollars sense. Chinatown, where we have the City's highest population density and probably the greatest concentration of new immigrants represents an ideal location for teaching and learning amongst newcomers and adults eager to improve themselves through education.

Cameron House, a community center in Chinatown, along with other agencies and churches have for decades provided classroom space to accommodate the growing needs of the Community.College Program. At best, this approach compromised consistency and quality for learning because of the constraints placed by the use of shared space, equipment and often, supplies. Clearly, the burden of maintaining a decent environment for learning at that level cannot be forever borne by small non-profit agencies. **It is time to move from these temporary, stop-gap measures to a more realistic and permanent solution.**

Thus, we enthusiastically support the effort of the San Francisco Community College Board to establish a site in Chinatown. Any opposition to this effort must be weighed carefully against the long term economic and social benefits which will result from having a better educated community.

We join the many who endorse this project and urge that every effort be made to implement this project.

Sincerely,

Harry Chuck

The Rev. Harry Chuck
Executive Director

An Agency
of the
Presbyterian
Church USA

A United
Way Agency

AsianAmerican
Architects and
Engineers

1998 AAAE
BOARD MEMBERS

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May 19, 1998

City College of San Francisco
Chancellor Del Anderson & Board of Trustees
50 Phelan Ave. E200
San Francisco, CA 94112

Dear Chancellor Anderson and Members of the City College of San Francisco Board of Trustees,

On behalf of Asian American Architects & Engineers, I am writing in support of the proposed City College of San Francisco Chinatown/North Beach campus on the corner of Washington and Columbus Streets. This new Campus would be an invaluable institution in Chinatown by creating convenient access to educational advancement.

Over the past years, the Community College system has been a valuable training ground for many members of the Asian American Architects and Engineers. Many of whom have graduated and become successful professionals in their field. We believe the new Campus with state of the art computer technology and more vocational training opportunities will be an asset for the Chinatown community as well as for working adults seeking advancement in their profession.

Furthermore, the new campus will be accessible to be a larger population thanks to new childcare center, increased proximity to public transportation, and accessible facilities for people with disabilities. In sum, the new campus would enable the City College district to effectively meet the growing needs of the Chinatown community.

As a predominantly low-income neighborhood with a high percentage of recent immigrants, Chinatown is in dire need of more educational and vocational resources. We applaud the City College Board of Trustees' decision to establish a permanent campus in Chinatown and hope to work together to make it a reality. If you have any questions, please do not hesitate to call me at (415) 928-5910.

Yours truly,

Samuel Kwong

Samuel Kwong
President

1670 Pine Street
San Francisco
CA 94109
415 928-5910

ASIAN WOMEN'S RESOURCE CENTER
亞洲婦女服務中心

May 12, 1998

City College of San Francisco
Chancellor Del Anderson & Board of Trustees
50 Phelan Avenue, E200
San Francisco, CA 94112

Dear Chancellor Anderson and Members of the City College of San Francisco Board of Trustees:

On behalf of the Asian Women's Resource Center, I am writing in support of the proposed City College of San Francisco Chinatown/North Beach Campus on the corner of Washington and Columbus Streets. By increasing access to and opportunities for educational advancement, the new City College Campus would be an invaluable institution in Chinatown.

The new campus would offer state of the art computer technology, an increased number of English as a Second Language courses, and more vocational training opportunities. The improved facilities will also allow City College to offer more computer application courses and a larger number of business and finance classes. Furthermore, the new campus will be accessible to a larger population thanks to a new childcare center, increased proximity to public transportation, and accessible facilities for people with disabilities. In sum, the new campus would enable the City College district to effectively meet the growing needs of the Chinatown community.

As a predominantly low-income neighborhood with a high percentage of recent immigrants, Chinatown is in dire need of more educational and vocational resources. We applaud the City College Board of Trustees' decision to establish a permanent campus in Chinatown and hope to work together to make it a reality. If you have any questions, please do not hesitate to call me at (415) 788-1008. Thank you

Yours truly,

Gloria Tan

Gloria Tan
Executive Director

940 Washington Street San Francisco, California, 94108
415.421.8827 415.788.1008

TOM HSIEH

May 18, 1998

Chancellor Del Anderson & Board of Trustees
San Francisco Community College District
50 Phelan Ave. E200
San Francisco, CA 94112

Dear Chancellor Anderson & Members of the San Francisco Community College Board.

I am writing in support of the proposed City College of San Francisco Chinatown/North Beach campus on the corner of Washington and Columbus Streets. As a former member of the San Francisco Board of Supervisors and someone who has been active in the Chinese-American community for many years, I have heard too many stories of the difficulties that Chinatown and North Beach residents face in obtaining educational services from City College. The current facility is spread over nine different sites. Some of the sites are not accessible to people with disabilities, and most do not provide childcare.

The proposed new campus would offer state of the art computer technology, an increased number of English as a Second Language courses, and more vocational training opportunities. The improved facilities will also allow City College to offer more computer application courses and a larger number of business and finance classes. Furthermore, the new campus will be accessible to a larger population thanks to a new childcare center, increased proximity to public transportation, and accessible facilities for people with disabilities. In sum, the new campus would enable the City College district to effectively meet the growing needs of the Chinatown community.

As a predominantly low income neighborhood with a high percentage of recent immigrants, Chinatown is in dire need of more educational and vocational resources. I strongly urge the Board of Trustees to establish a permanent campus in Chinatown and to not let opposition from a relatively small group of people stop this project.

Sincerely,

Tom Hsieh
Former Member of the San Francisco Board of Supervisors

1151 TAYLOR STREET • SAN FRANCISCO CA • 94108
PHONE (415) 923-0110 • FAX (415) 923-1724

Northeast Community
FEDERAL CREDIT UNION

May 18, 1998

City College of San Francisco
Chancellor Del Anderson & Board of Trustees
50 Phelan Ave. E200
San Francisco, CA 94112

Dear Chancellor Anderson and Members of the City College of San Francisco Board of Trustees,

On behalf of Northeast Community Federal Credit Union, I am writing in support of the proposed City College of San Francisco Chinatown/North Beach campus on the corner of Washington and Columbus Streets. By increasing access to and opportunities for educational advancement, the new City College Campus would be an invaluable institution in Chinatown.

The new campus would offer state of the art computer technology, an increased number of English as a Second Language courses, and more vocational training opportunities. The improved facilities will also allow City College to offer more computer application courses and a larger number of business and finance classes. Furthermore, the new campus will be accessible to a larger population thanks to a new childcare center, increased proximity to public transportation, and accessible facilities for people with disabilities. In sum, the new campus would enable the City College district to effectively meet the growing needs of the Chinatown community.

As a predominantly low-income neighborhood with a high percentage of recent immigrants, Chinatown is in dire need of more educational and vocational resources. We applaud the City College Board of Trustees' decision to establish a permanent campus in Chinatown and hope to work together to make it a reality. If you have any questions, please do not hesitate to call me at (415) 434-0738.

Yours truly,

Lily Lo,
Manager

19 Walter U. Lum Place
San Francisco
CA 94108

Phone: 415-434-0738
FAX: 415-434-0715

AACE
EDUCATIONAL SERVICES
TALENT SEARCH PROGRAM

RECEIVED
JUN 2 1998

May 14, 1998

City College of San Francisco
Chancellor Del Anderson & Board of Trustees
50 Phelan Ave. E200
San Francisco, CA 94112

Dear Chancellor Anderson and Members of the City College of San Francisco Board of Trustees,

On behalf of AACE Educational Services Talent Search Project, I am writing in support of the proposed City College of San Francisco Chinatown/North Beach campus on the corner of Washington and Columbus Streets. By increasing access to and opportunities for educational advancement, the new City College Campus would be an invaluable institution in Chinatown.

Then new campus would offer state of the art computer technology, an increased number of English as Second Language courses, and more vocational training opportunities. The improved facilities will also allow City College to offer more computer application courses and a larger number of business and finance classes. Furthermore, the new campus will be accessible to a larger population thanks to a new childcare center, increased proximity to public transportation, and accessible facilities for people with disabilities. In sum, the new campus would enable the City College district to effectively meet the growing needs of the Chinatown community.

As a predomintly low-income neighborhood with a high percentage of recent immigrants, Chinatown is in dire need of more educational and vocational resources. We applaud the City College Board of Trustees' decision to establish a permanent campus in Chinatown and hope to work together to make it a reality. If you have any questions, please do not hesitate to call me at (415) 921-5537.

Yours truly,

Emalyn Lapus
Project Director

TRIO
1596 POST STREET
SAN FRANCISCO, CA 94109
415.921.5537
FAX 563 7109

AACE PROVIDES EDUCATIONAL SERVICES FREE OF CHARGE WITH EQUAL ACCESS AND TREATMENT FOR ALL PERSONS

C Y C Chinatown Youth Center. Today's generation. Tomorrow's future.

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Executive Director
Lawrence Tsang

Main Office
1693 Polk Street
San Francisco, CA 94109
Tel: 415-775-2636
Fax: 415-775-1345

ichmond Branch Office
319 Sixth Ave., Suite 201
San Francisco, CA 94118
Tel: 415-752-9675
Fax: 415-752-9033

May 14, 1998

Chancellor Del Anderson
City College of San Francisco
50 Phelan Avenue E200
San Francisco, CA 94112

Dear Chancellor Anderson:

On behalf of Chinatown Youth Center, I am writing in support of the proposed City College of San Francisco Chinatown/North Beach campus on the corner of Washington and Columbus Streets. As an agency serving Asian youth and their families, we can attest to the great need for expanded access to education in Chinatown.

The new campus would greatly contribute to meeting the educational needs of Chinatown residents. In particular, the expansion and improvement of English as a Second Language courses, vocational training programs, and computer technology would benefit the young adults we serve in our programs.

As a predominantly low-income neighborhood with a high percentage of recent immigrants, Chinatown is in dire need of more vocational resources. We applaud the City College Board of Trustees' decision to establish a permanent campus in Chinatown and hope to work together to make it a reality.

Sincerely,

May Gutchinov
Executive Director

a United Way Agency

ASIAN PACIFICDEMOCRATIC CLUB
3145 Geary Boulevard, #453
San Francisco, CA 94118
415-279-6877
Website: www.sfvoter.com/APDC

May 18, 1998

Honorable Trustees of the Community College Board
& Chancellor Del Anderson
City College of San Francisco
50 Phelan Avenue, Room E200
San Francisco, CA 94112

RE: Support for Chinatown Campus

Honorable Trustees & Chancellor Anderson:

It is my understanding that the Board will be making key decisions on the development of a Chinatown campus. The Asian Pacific Democratic Club supports the proposed Chinatown campus. The following resolution was passed by APDC in February, 1998:

RESOLUTION SUPPORTING THE CREATION OF A SAN FRANCISCO CITY COLLEGE CHINATOWN CAMPUS

WHEREAS: City College of San Francisco (CCSF) is the largest multi-campus community college in the nation with 85,000 students and approximately, 3000 employees.

WHEREAS: CCSF is the only opportunity for many to prepare for a better life and a better future and has provided high quality, affordable and accessible education to many generations of San Franciscans. It has in short, provided hope for a better life for many.

WHEREAS: The current CCSF Chinatown/North Beach Campus at 940 Filbert Street has been an integral part of the Chinese community for twenty years, and has had an impact on the lives of many thousands of students, however, the lease on the current space expires in the year 2001.

WHEREAS: The current site is inadequate for current program needs and do not provide any opportunity for expansion to address the growing needs of the Chinatown/North Beach community.

WHEREAS: The establishment of a college campus in San Francisco's Chinatown would be historic. The CCSF campus would the first college campus in any Chinatown in the United States.

WHEREAS: CCSF has located property in San Francisco's Chinatown after a three year search that would be suitable for the new state-of-the-art city college campus that would meet the needs of the Chinatown/North Beach community.

WHEREAS: The Asian Pacific Democratic Club was founded to advocate for the well-being of our community and to fight for the equal rights of all people.

THEREFORE, BE IT RESOLVED this 5th day of February, 1998, that the Asian Pacific Democratic Club supports all efforts to establish a City College of San Francisco Chinatown Campus to meet the educational and vocational needs of our growing community, and for all those seeking a better life through education.

Thank you for your attention to this matter.

Sincerely,

Alan T. Huie
Co-Chair

Community Educational Services
CES

80 Fresno Street
San Francisco
California
94133
415.982.0615

May 18, 1998

City College of San Francisco
Chancellor Del Anderson & Board of Trustees
50 Phelan Ave., E200
San Francisco, CA 94112

Dear Chancellor Anderson and Members of the City College of San Francisco Board of Trustees:

On behalf of Community Educational Services, I am writing in support of the proposed City College of San Francisco Chinatown/North Beach campus on the corner of Washington and Columbus Street. By increasing access to and opportunities for educational advancement, the new City College Campus would be an invaluable institution in Chinatown.

The new campus would offer state of the art computer technology, an increased number of English as a Second Language courses, and more vocational training opportunities. The improved facilities will also allow City College to offer more computer application courses and a lager number of business and finance classes. Furthermore, the new campus will be accessible to a larger population thanks to a new childcare center, increased proximity to public transportation, and accessible facilities for people with disabilities. In sum, the new campus would enable the City College district to effectively meet the growing needs of the Chinatown community.

As a predominantly low-income neighborhood with a high percentage of recent immigrants, Chinatown is in dire need of more educational and vocational resources. We applaud the City College Board of Trustees' decision to establish a permanent campus in Chinatown and hope to work together to make it a reality. If you have any questions, please do not hesitate to call me at (415) 982-0615, voicemail extension 5#.

Sincerely yours,

Darin Ow-Wing
Executive Director

On Lok

On Lok Senior Health Services
1333 Bush Street
San Francisco, CA 94109-5611
tel: (415) 292-8888
fax: (415) 292-8745

May 19, 1998

City College of San Francisco
Chancellor Del Anderson and Board of Trustees
50 Phelan Avenue, E200
San Francisco, CA 94112

Dear Chancellor Anderson and Members of the City College of San Francisco Board of Trustees:

On behalf of On Lok Senior Health Services, I am writing in support of the proposed City College of San Francisco Chinatown/North Beach campus on the corner of Washington and Columbus Streets. A new City College campus would be a tremendous resource for this area of the city in order to improve opportunities for educational advancement. The campus, which is intended to provide vocational training opportunities, state of the art computer technology and sorely needed English as a Second Language courses, would truly improve the social and economic well-being of residents in this part of the city. Due to increased accessibility both by location and for people with disabilities, this will open new opportunities not currently available in this growing segment of the population.

We applaud your intent as a Board of Trustees to establish a campus here in Chinatown. As an employer of over 500 staff we would both benefit, as well as hope to contribute to this potential, valuable San Francisco resource.

Please do not hesitate to call me at 292-8880 if you have any questions.

Sincerely,

Jennie Chin Hansen

Jennie Chin Hansen
Executive Director

JCH/jyo

Member, Board of Supervisors
City and County of San Francisco

Chair, Finance Committee

MABEL TENG

May 19, 1998

City College of San Francisco
Chancellor Del Anderson & Board of Trustees
50 Phelan Ave., E200
San Francisco, CA 94112

Dear Chancellor Anderson and Members of the City College of San Francisco Board of Trustees:

I urge you to strongly consider the proposed Chinatown/North Beach Campus for City College at the corner of Washington and Columbus Streets.

As we all know, there is a urgent need to consolidate the nine existing sites of the Chinatown/North Beach campus into a single location. Program needs have expanded and we must meet that need with a well thought out solution. The proposed site provides the opportunity to increase City College's access to a larger population and expand programs to meet that increase.

The new campus will offer state of the art computer technology, additional English as a Second Language courses, and greater vocational training programs. The campus will also offer a larger number of business and finance courses.

Moreover, with the addition of a new child care center, improved access to public transportation, and facilities designed to provide full access to persons with disabilities, this exceptional new campus will exist for generations to serve the growing needs of the Chinatown/North Beach community.

As services for immigrants decline throughout the state, we must do what we can to help them to help themselves. Providing necessary educational resources is a major component. This campus is integral in assisting the large numbers of immigrants assimilate and succeed.

Thank you for your dedication to bring a permanent campus to Chinatown. I offer you my complete support and invite you to contact me if I can be of any assistance.

Sincerely,

Mabel Teng

Mabel Teng
Member, Board of Supervisors
Chair, Finance Committee

401 Van Ness Avenue • Room 308 • San Francisco, California 94102-4534 • (415) 554-4981 • FAX (415) 554-4985 • TDD (415) 554-5227

余胤良博士

Leland Y. Yee, Ph.D.
San Francisco Board of Supervisors

三藩市市参事

May 19, 1998

Del Anderson
City College of San Francisco
50 Phelan Ave., E200
San Francisco, CA 94112

Dear Ms. Anderson,

I am writing to urge the City College Board of Trustees to support the proposed College of San Francisco Chinatown/North Beach campus. This campus will provide vital educational resources such as state of the art computer technology, more ESL classes, and more vocational training opportunities. Noteworthy is the campus' new child care center which will allow the campus to serve a wider range of students. By increasing access to and opportunities for educational advancement, the new City College Campus would be an invaluable institution to the Chinatown area and the City as a whole.

I strongly urge the City College Board of Trustees to support the building of a new Chinatown North Beach campus.

Very truly yours,

Leland Y. Yee, Ph.D.
Member
Board of Supervisors

LYY: jl

401 Van Ness Avenue, Room 308 • San Francisco, CA 94102-4540 • (415) 554-7752 • Fax (415) 554-7751 • TDD (415) 554-5227
Leland_Yee@ci.sf.ca.us • www.LelandYee.com

SAN FRANCISCO
CHAMBER OF COMMERCE

May 17, 1998

Chancellor Del Anderson & Board of Trustees
City College of San Francisco
50 Phelan Avenue E200
San Francisco, CA 94112

Dear Chancellor Anderson and Members of the City College of San Francisco Board of Trustees:

On behalf of the San Francisco Chamber of Commerce, I am writing in support of the proposed City College of San Francisco Chinatown/North Beach campus on the corner of Washington and Columbus Streets. By increasing access to and opportunities for educational advancement, the new City College Campus would be an invaluable institution in Chinatown.

The new campus would offer state of the art computer technology, an increased number of English as a Second Language courses and more vocational training opportunities. The improved facilities will also allow City College to offer more computer application courses and a larger number of business and finance classes. Furthermore, the new campus will be accessible to a larger population, thanks to a new childcare center, increased proximity to public transportation and accessible facilities for people with disabilities. In sum, the new campus would enable the City College district to effectively meet the growing needs of the Chinatown community.

As a predominantly low-income neighborhood with a high percentage of recent immigrants, Chinatown is in dire need of more educational and vocational resources. We applaud the City College Board of Trustees' decision to establish a permanent campus in Chinatown and we hope to work together to make it a reality. If you have any questions, please do not hesitate to call me at 352-8810.

Sincerely,

SR for Roberta Achtenberg

Roberta Achtenberg
Senior Vice President for Public Policy

RA:slr

465 California St., 9th Flr.
San Francisco, CA 94104
Phone 415-392-4520
Fax 415-392-0485
www.sfchamber.com

WALDECK'S
OFFICE·SUPPLIES

500 Washington Street
San Francisco, CA 94111
415.981.3381 Fax 415.981.2543

May 19, 1998

Board of Trustees
San Francisco Community College District

Dear Trustees:

I enthusiastically endorse the construction of the City College of San Francisco, Chinatown/North Beach Project. The campus would be a great benefit to the neighborhood.

As a local merchant whose business has been in the neighborhood for over 40 years, I believe the campus would help revitalize the surrounding businesses that are somewhat in a no-man's land between North Beach, Chinatown and the Financial District. I strongly feel that the campus would become the glue that binds these three important and diverse communities together.

I also look forward to continuing my own education at this nearby campus.

Sincerely,

Clifford Waldeck

Clifford Waldeck
President
Waldeck's Office Supplies

Honorable Board of Trustees:

My name is Poyee Au. I am the Director of Employment Training and Economic Development Program at Self-Help for the Elderly. I am speaking in strong support for the establishment of a permanent School site for the City College of San Francisco – Chinatown / North Beach Campus at its proposed location at Washington Street.

We need our permanent school here and now in Chinatown. We have been longing for a permanent home for the Chinatown / North Beach Campus for decades. I remembered it was on the agenda when I first started to work at Self-Help in 1983. Thereafter there had been numerous meetings on the needs of having more space, more facilities, more resources, more classes, and eventually it boiled down to the need to have an adequate permanent school. We are very pleased to know that now we have had a chance to build our new home together. Let's all work together and build the Chinatown/ North Beach Campus for our community. This new "Home" is important to us. It nurtures every member of our community. It helps the monolingual new immigrants to learn English, as well as to learn about our country and become good citizens. It provides essential job training, basic skills, computer and new technology, and so for to our youngsters, adults, working-parents and older workers.

We need this new home! Over the years, Self-Help for the Elderly, with the support of the Chinatown North Beach Campus, has helped more than three-thousand new immigrants to be trained as housekeepers and certified home health aides. With the critical need for naturalization, every year we assist more than 600 senior students to take their citizenship examination. In addition, we have many other ESL and educational programs. In all these, we work in conjunction with Chinatown/North Beach Campus.

This new permanent Campus is important in that it provides a centrally located site which is easily accessible by both able and handicapped persons. The site is flexible with room for expansion of new programs. A permanent site will allow for long range planning. The new Campus will give the community a greater sense of identity and pride. All of these are important. Let's all work together and I urge all your support of this essential project. Thank You.

Comments from Po Yee Au, Self-Help for the Elderly

Honorable Board of Trustees:

We are speaking in strong support for the relocation of City College of San Francisco, Chinatown North Beach Campus into the new site located at Washington and Kearny Street.

First of all, we feel that it is very important for Chinatown to have its own locally based adult educational programs that are bi-lingual and bi-cultural. The programs offered by the Chinatown North Beach Campus are extremely important for the newly arrived immigrants, be it English-as-a-second language instruction, vocational programs, technical classes, citizenship programs, or other classes of interests. They are all critical for survival of the immigrant community. We need programs that are linguistically and culturally sensitive, staff who have the language and cultural background, and schools that are accessible in the neighborhood.

Since 1971, Self-Help for the Elderly has been working very closely with the Chinatown North Beach Campus. We are fortunate to have bilingual instructors from the Campus to teach housekeeping and certified home health aide classes. Both classes are important programs. We have trained over 1,500 older adults as housekeepers and over 1,000 older adults as certified home health aides. Not only have they become gainfully employed, they have also contributed valuable services to the community. With the huge need for naturalization, Self-Help also offers many citizenship and naturalization services, ESL classes and other educational programs. Unfortunately, we have always run into problems of classroom shortage and resource constraints. There are similar problems with other community-based organizations. We have requested assistance from the Chinatown North Beach Campus for classrooms and instructors for new programs. However, due to the small amount of classrooms at the existing site and limited resources, the Campus has had no choice but to deny our requests. The relocation will allow us to have more classrooms. We would definitely appreciate additional funding if at all possible for the Chinatown North Beach Campus, and for the Chinatown North Beach Campus to have a permanent school. Thank you.

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